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1 UNITED STATES DISTRICT COURT FOR THE
2 WESTERN DISTRICT OF TEXAS
3 AUSTIN DIVISION

4 DR. THOMAS HUBBARD, PhD.,)
5 Plaintiff,)
6 VS.) CA NO. 1:20-CV-00767-R
7)
8 SARAH ALLEN BLAKEMORE;)
9 AND JOHN DOES 1-10,)
10 Defendants.)

11 -----
12 ORAL AND VIDEOTAPED DEPOSITION OF
13 THOMAS HUBBARD
14 -----
15 May 25, 2021
16 -----
17 -----
18 ORAL AND VIDEOTAPED DEPOSITION OF
19 THOMAS HUBBARD, produced as a witness at the instance of
20 the Defendants, and duly sworn, was taken in the
21 above-styled and numbered cause on the 25th of
22 May, 2021, from 10:05 a.m. to 12:36 p.m., before
23 JAZZMEN CANALES, CSR, in and for the State of Texas,
24 reported by machine shorthand at Wright & Greenhill PC,
25 900 Congress Avenue, Suite 500, Austin, Texas 78701,
 Pursuant to the Texas Rules of Civil Procedure and the
 provisions attached hereto.

EXHIBIT 3

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6 to 9

<p style="text-align: right;">Page 6</p> <p>1 THE WITNESS: Okay.</p> <p>2 A. Has anyone been living there since then? No.</p> <p>3 I mean, not for any period more than about two weeks.</p> <p>4 Q. (BY MR. PRINGLE JR.) All right. Has anyone</p> <p>5 lived there since -- with you for more than a period of</p> <p>6 two weeks since, say, January of 2020?</p> <p>7 A. No.</p> <p>8 Q. And this is a home, I presume, that you own?</p> <p>9 A. Yes.</p> <p>10 Q. And you also have an address in Austin?</p> <p>11 A. No longer. I do own a property in Austin, but</p> <p>12 that is rented out.</p> <p>13 Q. And back in the end of 2019, were you residing</p> <p>14 at that address?</p> <p>15 A. Yes, I was. Well, if you are talking about</p> <p>16 December 31st of 2019, no. But up until the incident</p> <p>17 where my house was assaulted by a violent mob, I was</p> <p>18 living there for the fall semester while I was teaching</p> <p>19 at U.T.</p> <p>20 Q. All right. And how long have you lived at the</p> <p>21 Austin address before you departed, say, in early</p> <p>22 December 2019?</p> <p>23 A. I came back there in late August at the</p> <p>24 beginning of the semester, and I also resided there</p> <p>25 during fall semester of 2018. During the spring, I was</p>	<p style="text-align: right;">Page 8</p> <p>1 Q. All right. And if you answer a question</p> <p>2 without asking for clarification, may I presume that you</p> <p>3 understood it at the time?</p> <p>4 A. Yes.</p> <p>5 Q. And so far you are doing a very good job of</p> <p>6 patiently waiting until the end of my question before</p> <p>7 you start your response, which is good for our court</p> <p>8 reporter so she can take down a full question and a full</p> <p>9 response. Okay?</p> <p>10 A. Yes.</p> <p>11 Q. All right. If at any time I cut you off and</p> <p>12 you are not done talking, you let me know, and I will be</p> <p>13 quiet until you are. Okay?</p> <p>14 A. Thank you.</p> <p>15 Q. All right. And by the same token, if you will</p> <p>16 continue to let me get to the end of my question so I</p> <p>17 don't have to repeat it, that would be much appreciated</p> <p>18 as well.</p> <p>19 A. Yes, of course.</p> <p>20 Q. All right. And finally, you are doing a good</p> <p>21 job of answering with words as opposed to merely</p> <p>22 gestures or guttural utterances like uh-huh and huh-uh,</p> <p>23 which need to be avoided. Okay?</p> <p>24 A. Yes. As a professor, I am experienced using</p> <p>25 words.</p>
<p style="text-align: right;">Page 7</p> <p>1 on leave and back in California.</p> <p>2 Q. I see. Have you ever given a deposition</p> <p>3 before?</p> <p>4 A. No.</p> <p>5 Q. Have you ever testified in court?</p> <p>6 A. Only in small claims cases.</p> <p>7 Q. I assume that you had a chance to meet with</p> <p>8 Mr. Sibley and has explained to you what a deposition</p> <p>9 is. So let me say that, first off, in examining you</p> <p>10 today I am not interested in anything that Mr. Sibley</p> <p>11 has told you or that you have told him. You understand</p> <p>12 that?</p> <p>13 A. Of course.</p> <p>14 Q. You understand that's privileged?</p> <p>15 A. Yes, of course.</p> <p>16 Q. All right. You understand that you are giving</p> <p>17 sworn testimony subject to pains and penalty of perjury?</p> <p>18 A. Yes.</p> <p>19 Q. And you understand that because you are giving</p> <p>20 sworn testimony, it is important that you understand all</p> <p>21 my questions?</p> <p>22 A. Yes.</p> <p>23 Q. And if I ever ask you a question that is</p> <p>24 unclear to you, will you tell me that it is unclear?</p> <p>25 A. Yes, certainly.</p>	<p style="text-align: right;">Page 9</p> <p>1 Q. Good. You are going to use a lot of them</p> <p>2 today.</p> <p>3 A. Probably.</p> <p>4 Q. What did you do to prepare for your deposition?</p> <p>5 A. I reviewed some of the legal documents that</p> <p>6 have been filed.</p> <p>7 Q. By legal documents, what are you referring to?</p> <p>8 A. Our original filing, your motion for summary</p> <p>9 judgment, our response to that motion, a couple of the</p> <p>10 exhibits to the various filings.</p> <p>11 Q. Anything else?</p> <p>12 A. I did review a portion of one of my articles.</p> <p>13 Q. Anything else?</p> <p>14 A. Not that I can think of.</p> <p>15 Q. All right. Did you review any of the discovery</p> <p>16 responses?</p> <p>17 A. Yes. I believe those were among the documents</p> <p>18 that I reviewed.</p> <p>19 Q. And you reviewed a portion of one of your</p> <p>20 articles?</p> <p>21 A. Yes.</p> <p>22 Q. Which article did you review a portion of?</p> <p>23 A. The one that was published in the Thymos in</p> <p>24 2010.</p> <p>25 Q. And the name of that article is that?</p>

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10 to 13

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1 A. Sexual Consent and the Adolescent Male, or What 2 Can We Learn from the Ancient Greeks. 3 Q. And why did you review that article? 4 A. Because one of the statements in the 5 Defendant's defamatory flyer quoted three words from 6 that article, and I wanted to review the context of 7 those three words. 8 Q. And which were the three words that were 9 quoted? 10 A. Proper learning experience. 11 Q. And were those three words quoted accurately? 12 A. I did put those three words together, but they 13 of course came within a much more complicated context. 14 Q. We may talk about that later. Any other 15 documents that you recall reviewing? 16 A. Not in the immediate period before this 17 deposition. 18 Q. All right. Other than meetings with 19 Mr. Sibley, have you had conversations with anyone about 20 your deposition? 21 A. Only to let them know that I was doing a 22 deposition, but not conversations that went into any 23 detail about the issues involved. 24 Q. And who would you have told that you were 25 giving a deposition?	1 A. Romantic, but not sexually. 2 Q. All right. And how old is Mr. Wells? 3 A. 22. 4 Q. And was he a student of yours? 5 A. No. 6 Q. Okay. Have you ever taught him anything? 7 A. No. 8 Q. And how did you and Mr. Wells meet? 9 A. Through an online gay meeting site. 10 Q. Okay. And what was the name of it? 11 A. I think seekingarrangement.com. 12 Q. Is it a -- is it a members only site? 13 A. You have to pay to be a member of it. 14 Q. All right. And so absent the payment, and the 15 membership access is restricted? 16 A. Yes. 17 Q. Are a member of any other similar sites? 18 A. No, and even my membership there lapsed years 19 ago. 20 Q. All right. Anybody else that you discussed 21 your deposition with besides Mr. Wells? 22 A. Avi Eindorot. 23 Q. And can you spell that? Avi I got. 24 A. Eindorot is E-I-N-D-O-R-O-T. 25 Q. D-O --
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1 A. My current partner who is traveling with me. 2 Q. And what is his or her name? 3 A. Elijah Wells. 4 Q. And this is -- are y'all married? 5 A. No. 6 Q. What does Mr. Wells do? 7 A. He was a student at a local community college, 8 and he is about to take on a job working at a local 9 tavern once we get back from our trip. 10 Q. And what community college was Mr. Wells a 11 student in? 12 A. Sacramento City College. 13 Q. Is that in Chico? 14 A. No. It is in Sacramento, but given that all 15 classes were online, he did not attend classes in 16 person, so he could do that remotely. 17 Q. All right. And how long have you and Mr. Wells 18 been together? 19 A. I think since 2018, and then we had a period of 20 rupture and didn't see each other at all for over a 21 year. And then earlier this year we were both tired of 22 being isolated due to COVID, so we rekindled our 23 friendship. 24 Q. Okay. And am I correct that it's a romantic 25 friendship?	1 A. R-O-T. 2 Q. And who is Avi Eindorot? 3 A. He is the vice president of the William A. 4 Percy Foundation. 5 Q. And what were the nature of your conversations 6 with Mr. Eindorot? 7 A. He had concerns about the foundation being 8 drawn into this. 9 Q. And what were those concerns? 10 A. The privacy of the directors and donors and 11 grantees. 12 Q. Anything else? 13 A. That was essentially it. 14 Q. And you mentioned the William A. Percy 15 Foundation. Is that a 501(c) (3)? 16 A. Yes. 17 Q. And it makes, I guess, reports and filings with 18 the -- with the appropriate authorities as a 501(c) (3)? 19 A. Yes, we do. 20 Q. What sorts of things does the William A. Percy 21 Foundation disclose as part of its public filings? 22 A. Our tax records are public. We do filings with 23 the California State authorities, we file with the 24 Secretary of State in Delaware where we are 25 incorporated, and those filings would consist of naming

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<p style="text-align: right;">Page 14</p> <p>1 our directors and relative basic information like that.</p> <p>2 Q. Understood. Who are the directors of the</p> <p>3 William A. Percy Foundation?</p> <p>4 A. Myself, Avi Eindorot, James Dubro,</p> <p>5 Thomas Waugh, and Beert Viscrat. There are five of us.</p> <p>6 Q. Okay. Avi, you have spelled his name. You we</p> <p>7 have got. What is James' last name?</p> <p>8 A. Dubro, that's D-U-B-R-O.</p> <p>9 Q. All right. And Thomas Waugh?</p> <p>10 A. Yeah, W-A-U-G-H. It is like Evelyn Waugh.</p> <p>11 Q. Understood. And Beert, what's Beert's last</p> <p>12 name?</p> <p>13 A. Verstraete, V-E-R-S-T-R-A-E-T-E.</p> <p>14 Q. All right.</p> <p>15 A. And it is Beert spelled with two Es.</p> <p>16 Q. One in the --</p> <p>17 A. It is a Dutch name.</p> <p>18 Q. One in the middle, one on the end?</p> <p>19 A. No, no, no. It is like beer, plus T.</p> <p>20 Q. Oh, I gotcha.</p> <p>21 A. It is the Dutch spelling.</p> <p>22 Q. And Avi, he is the vice president of the</p> <p>23 William A. Percy Foundation. Does Avi have any other</p> <p>24 employment besides that?</p> <p>25 A. He is a freelance journalist.</p>	<p style="text-align: right;">Page 16</p> <p>1 different Concordia.</p> <p>2 Q. And where is that Concordia where Professor</p> <p>3 Waugh was?</p> <p>4 A. Montreal</p> <p>5 Q. And Beert with two Es. Is he also a professor?</p> <p>6 A. He is a retired professor.</p> <p>7 Q. All right. And where did Professor Verstraete</p> <p>8 profess?</p> <p>9 A. Acadia University.</p> <p>10 Q. In Nova Scotia?</p> <p>11 A. Yes, indeed.</p> <p>12 Q. And how long has he been retired?</p> <p>13 A. Again, I think probably about five years.</p> <p>14 Although, I think he did do some part-time teaching even</p> <p>15 after his formal retirement, but I think now he does not</p> <p>16 teach at all.</p> <p>17 Q. And what were his subjects of expertise when he</p> <p>18 was teaching at Acadia?</p> <p>19 A. History and classics.</p> <p>20 Q. And how long have the five of you been the</p> <p>21 board at the William A. Percy Foundation?</p> <p>22 A. Thomas Waugh is the most recent member of the</p> <p>23 board, and I think he joined us last fall.</p> <p>24 Q. Other than your -- well, let me ask you this.</p> <p>25 Your work with the William A. Percy Foundation, are you</p>
<p style="text-align: right;">Page 15</p> <p>1 Q. All right. Is he also the IT director at</p> <p>2 William A. Percy.</p> <p>3 A. Well, we call it webmaster.</p> <p>4 Q. Okay. And he performs that task?</p> <p>5 A. Yes.</p> <p>6 Q. And James Dubro, is -- what's his side job?</p> <p>7 A. He is retired.</p> <p>8 Q. Before he was retired, what was his job?</p> <p>9 A. He was a crime reporter with the Canadian</p> <p>10 Broadcasting Corporation, and there is other news --</p> <p>11 Canadian news outlets.</p> <p>12 Q. Where was he based in Canada?</p> <p>13 A. Toronto.</p> <p>14 Q. And how long has he been retired?</p> <p>15 A. I am not sure exactly, but I think he has been</p> <p>16 retired since I knew him, which is approximately the</p> <p>17 last five years. He is in his 70s.</p> <p>18 Q. All right. And Thomas Waugh, is he -- what's</p> <p>19 his -- does he have another job?</p> <p>20 A. He is retired.</p> <p>21 Q. And what was his prior job before retirement?</p> <p>22 A. He was a professor of cinema and media studies</p> <p>23 at Concordia University.</p> <p>24 Q. Here in Austin?</p> <p>25 A. No, no, no, not our Concordia, it is a</p>	<p style="text-align: right;">Page 17</p> <p>1 paid for that?</p> <p>2 A. No.</p> <p>3 Q. Are you -- you continue to be a member of the</p> <p>4 University of Texas faculty?</p> <p>5 A. Yes.</p> <p>6 Q. And you -- I think I saw something about your</p> <p>7 salary. What is your salary at U.T.?</p> <p>8 A. Around 107,000. For the last several years I</p> <p>9 have told them that I don't need any raises. I feel</p> <p>10 that what money is available should go to younger</p> <p>11 faculty who would benefit from it more, and, you know, I</p> <p>12 don't really need the money.</p> <p>13 MR. PRINGLE JR.: Objection.</p> <p>14 Nonresponsive.</p> <p>15 Q. (BY MR. PRINGLE JR.) What other sources of</p> <p>16 income do you have besides your income at U.T.?</p> <p>17 A. I own a number of rental real estate</p> <p>18 properties.</p> <p>19 Q. Here in Austin?</p> <p>20 A. Only the one residence in Austin where I used</p> <p>21 to live. Most of them -- I mean, the others are all in</p> <p>22 Chico.</p> <p>23 Q. Any other income besides your rental properties</p> <p>24 and your U.T. income?</p> <p>25 A. Royalties from some of my books.</p>

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18 to 21

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<p>1 Q. Anything else?</p> <p>2 A. Not other than tiny amounts of interest on bank</p> <p>3 accounts.</p> <p>4 Q. Okay. And generally, what do your royalties</p> <p>5 from your books run a year?</p> <p>6 A. Slightly over a thousand.</p> <p>7 Q. Tell me about your employment at U.T. When did</p> <p>8 you come to U.T.?</p> <p>9 A. 1985. And that was a one-year position. From</p> <p>10 1986 to 1988 I was at Cornell, and then I was brought</p> <p>11 back to U.T. in 1988 in a tenure-screen position, which</p> <p>12 I have held continuously since then.</p> <p>13 Q. Let's start -- let's start with where you grew</p> <p>14 up.</p> <p>15 A. Uh-huh.</p> <p>16 Q. You grew up in Oklahoma?</p> <p>17 A. Until the age of 4.</p> <p>18 Q. And then where?</p> <p>19 A. In the Bay Area of California. Originally, my</p> <p>20 family lived in San Mateo, after that in Walnut Creek.</p> <p>21 Both are suburbs of San Francisco.</p> <p>22 Q. And you graduated high school in the Bay Area?</p> <p>23 A. Yes, in Walnut Creek.</p> <p>24 Q. And that would have been probably 1974ish?</p> <p>25 A. '72.</p>	<p>1 certainly do read them.</p> <p>2 Q. And fluent in German?</p> <p>3 A. Relatively, and I have lived in Germany.</p> <p>4 Q. Okay. After 1977, did you continue your</p> <p>5 studies?</p> <p>6 A. Yes, at Yale University.</p> <p>7 Q. And at Yale University, when were you there?</p> <p>8 A. '77 to '80.</p> <p>9 Q. And what was your degree in?</p> <p>10 A. Classics.</p> <p>11 Q. And what -- what is your degree from Yale?</p> <p>12 A. Ph.D.</p> <p>13 Q. What was your dissertation?</p> <p>14 A. It was called Polar Structure in the Odes of</p> <p>15 Pindar. Pindar is a Greek poet.</p> <p>16 Q. 1980 until 1985 when you came to U.T., what did</p> <p>17 you do?</p> <p>18 A. I was a visiting assistant professor at Bard</p> <p>19 College in Annandale-On-Hudson, New York from '80 to</p> <p>20 '81. From '81 until '82, I did not have employment. It</p> <p>21 was a very tight job market then. From '82 to '84, I</p> <p>22 was assistant professor at Skidmore College in Saratoga</p> <p>23 Springs, New York. And from '84 to '85, I was a</p> <p>24 visiting assistant professor at the University of</p> <p>25 Minnesota.</p>
Page 19	Page 21
<p>1 Q. And then what did you do?</p> <p>2 A. I then went to college at Santa Clara</p> <p>3 University where I graduated in 1975.</p> <p>4 Q. And your degree was in what?</p> <p>5 A. English.</p> <p>6 Q. After 1975, what was your next academic</p> <p>7 outpost?</p> <p>8 A. I was a graduate student at the University of</p> <p>9 California, Berkeley.</p> <p>10 Q. And what period of time were you at Berkeley?</p> <p>11 A. '75 to '77.</p> <p>12 Q. And did you receive a graduate degree from</p> <p>13 Berkeley?</p> <p>14 A. A master's degree.</p> <p>15 Q. And what's your master's degree in?</p> <p>16 A. Comparative literature.</p> <p>17 Q. What is that exactly?</p> <p>18 A. It is a study of literary text from multiple</p> <p>19 linguistic and national traditions, and the ones that I</p> <p>20 specialized in at that point were Greek, Latin, and</p> <p>21 German.</p> <p>22 Q. I assume you are fluent in Greek, Latin, and</p> <p>23 German?</p> <p>24 A. Yes. Although, I don't speak Latin or ancient</p> <p>25 Greek. There is really no point in that, but I</p>	<p>1 Q. You mentioned that you also lived in Germany.</p> <p>2 When did you live in Germany?</p> <p>3 A. I had a research grant from the Alexander von</p> <p>4 Humboldt Foundation, and I believe that was '96 to '97.</p> <p>5 It might have been '95 to '96.</p> <p>6 Q. All right.</p> <p>7 A. And then I had a resumption fellowship with</p> <p>8 them in the spring semester of 2003, so I was in Germany</p> <p>9 approximately a year and a half.</p> <p>10 Q. And at the University of Texas, you had been</p> <p>11 here continuously since 1988, correct?</p> <p>12 A. Correct.</p> <p>13 Q. What are your interests? What are your</p> <p>14 academic interests at the University of Texas?</p> <p>15 A. I was hired as a specialist in Greek poetry,</p> <p>16 and starting after I received tenure in 1993, I became</p> <p>17 increasingly interested in ancient Greek homosexuality.</p> <p>18 And I taught the first course on any gay theme that</p> <p>19 anyone at the University of Texas taught.</p> <p>20 Q. Say that again.</p> <p>21 A. I taught the first course on a gay-related</p> <p>22 theme --</p> <p>23 Q. Oh.</p> <p>24 A. -- that has ever been taught at the University</p> <p>25 of Texas starting around 1993.</p>

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<p style="text-align: right;">Page 22</p> <p>1 Q. And am I correct then that none of your 2 academic endeavors were focused on ancient Greek 3 homosexuality or any homosexual themes before you 4 received tenure?</p> <p>5 A. That would be correct. Although, it comes up 6 as a theme ubiquitously in Greek poetry, which I had 7 certainly studied in the 13 years -- well, actually 8 counting my graduate work, the 18 years prior to that.</p> <p>9 Q. But prior to receiving tenure, you hadn't 10 written extensively on it or studied it --</p> <p>11 A. No at all.</p> <p>12 Q. -- exclusively, true?</p> <p>13 A. Not at all.</p> <p>14 Q. And what prompted you to turn your attention to 15 gay-related themes and homosexual studies in 1993?</p> <p>16 A. That I myself considered that I was gay, and, 17 you know, this was a way of making my academic training 18 relevant to that personal identity. I also had a sense 19 that gay students at the University were not being well 20 served with courses that were relevant to their 21 interest. And I perceived it as a need, and my 22 department was supportive of my teaching that course. 23 It was a completely new course that I devised.</p> <p>24 Q. Prior to you receiving tenure, did you consider 25 yourself to be gay?</p>	<p style="text-align: right;">Page 24</p> <p>1 day.</p> <p>2 Q. And I forget to ask you, but I assume I know 3 the answer to this, but let me make sure I am correct. 4 You've never married?</p> <p>5 A. No.</p> <p>6 Q. And you have no children?</p> <p>7 A. No.</p> <p>8 Q. Do you have any wards or minor children that 9 you have been responsible --</p> <p>10 A. No.</p> <p>11 Q. -- in your adult life?</p> <p>12 A. No.</p> <p>13 Q. Since January 2020 classes have you taken -- 14 have you taught?</p> <p>15 A. In spring of 2020, I was on sick leave. This 16 fall I taught classical mythology, and I taught the same 17 course this spring.</p> <p>18 Q. So no classes in spring of 2020?</p> <p>19 A. No.</p> <p>20 Q. And classical mythology, what is that class?</p> <p>21 A. It is surveys the major myths that we have 22 attested from ancient Greece and Rome. We talk about 23 the cults of the various Greco Roman gods. We talk 24 about the hero legends of Hercules and Perseus and, 25 you know, other well-known figures. I mean, many of</p>
<p style="text-align: right;">Page 23</p> <p>1 A. Yes.</p> <p>2 Q. Have you always considered yourself to be gay?</p> <p>3 A. Certainly since puberty.</p> <p>4 Q. All right.</p> <p>5 A. But I would say that nowadays I regard sexual 6 orientation as a much more fluid and complicated set of 7 desires and perceptions. I mean, part of my studying 8 and becoming learned in this subject was to see a lot of 9 complexities that as a younger man I did not yet 10 perceive. And of course society's perception of sexual 11 orientation has changed. I think today there is a much 12 greater recognition that sexual identities are very 13 complicated and fluid and evolving things.</p> <p>14 Q. Other interests that you had at the University 15 of Texas besides Greek poetry and homosexual studies?</p> <p>16 A. I have taught widely in Greek and Latin 17 literature that includes prose authors, taught quite a 18 few courses in Latin as well.</p> <p>19 Q. And you --</p> <p>20 A. I mean, we are broadly trained as classicists. 21 We have to pass comprehensive exams in both Greek and 22 Latin, and flexibility is something that is desired. I 23 would also say that I have always been very interested 24 in what we call classical reception, which is the study 25 of the classical tradition in later periods up to modern</p>	<p style="text-align: right;">Page 25</p> <p>1 whom students have heard about in their earlier life. 2 We also talk about literary works that involve 3 mythologies such as Homer's Iliad and various Greek 4 tragedies.</p> <p>5 Q. It is a survey course?</p> <p>6 A. At least the way I teach it, yes. It is a 7 survey of the corpus of Greek mythology.</p> <p>8 Q. It is an introductory course?</p> <p>9 A. Yes. It is a freshman-level course.</p> <p>10 Q. All right. And what's the enrollment of 11 classical mythology, say, in the fall of 2020?</p> <p>12 A. We teach several sections -- I mean, the 13 department teaches several sections of it.</p> <p>14 Q. In your section.</p> <p>15 A. My section was a fairly small section of around 16 40 students, both fall and spring. It was thought best 17 that I teach a small section because of student 18 anxieties in light of the defamatory statements of the 19 Defendant. There was concern that I shared about 20 students learn -- going online to look up whether I am a 21 good professor or not and then finding this garbage. 22 Whenever you google my name, it is the -- in fact, the 23 first video that comes up is a video of the attack of my 24 house and, you know, various articles in Austin 25 Statesman and Dallas Morning News, until we got it taken</p>

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<p style="text-align: right;">Page 26</p> <p>1 down, Law Enforcement Today. And it was very 2 distressing to students to hear that their professor is 3 an advocate of pedophilia. And in the fall I even had 4 one student's mother send me an angry e-mail demanding 5 to know about this and then complaining to the president 6 of the University. I mean, this is very distracting to 7 students, and, you know, it causes them not to trust 8 their teacher, and that interferes with their academic 9 performance.</p> <p>10 There was one student in the fall 2019 11 course that was so distressed by the flyer that the 12 Defendant passed out that she went to the Dean of 13 Students office and asked to be allowed not to attend 14 the class anymore. And as a result of not attending the 15 class, she of course missed everything that I introduced 16 in the last two or three weeks and did very poorly on 17 the final examination, which concentrated on that 18 material at the end of the course. And whereas she was 19 at least at a C level prior to that, in virtue of her 20 poor performance on the file, she received a D in the 21 course.</p> <p>22 So the Defendant's actions have not only 23 affected me and my reputation, they have affected and 24 distressed my students, and they have interfered with 25 the pedagogical mission of the University.</p>	<p style="text-align: right;">Page 28</p> <p>1 Q. How do you spell that? 2 A. G-U-L-I-Z-I-O. 3 Q. Okay. Gulizio. Who else? 4 A. I think there were a couple of graduate 5 students who were also involved. My understanding was 6 that because of the COVID shutdown of the University 7 that the other sections were entirely online. And my 8 section also used a lot of online materials, but it 9 included synchronous lectures by me, which we did via 10 Zoom.</p> <p>11 Q. The class that you taught last year -- last 12 semester, I should say, in fall of 2020, mythology -- 13 no, classical mythology, was it all virtual? 14 A. There were no in-person meetings. The 15 University's policy was that the majority of classes 16 would be online and only a few relatively small classes 17 in person.</p> <p>18 Q. And is that a typical course load for you, 19 teaching one intro-level course. 20 A. No. I mean, our usual course load is two 21 courses per semester.</p> <p>22 Q. And why did you not teach any other courses 23 last semester? 24 A. I have what is called modified instructional 25 status because they wanted me to design a new online</p>
<p style="text-align: right;">Page 27</p> <p>1 MR. PRINGLE JR.: Objection. 2 Nonresponsive.</p> <p>3 Q. (BY MR. PRINGLE JR.) Do you remember my 4 question? What question were you answering?</p> <p>5 A. Your question had to do with the -- the 6 teaching of the mythology course.</p> <p>7 Q. It was a simple question. How many students 8 are in your section?</p> <p>9 A. No, I think that was the starting point, yes, 10 and I told you around 40.</p> <p>11 Q. Yeah.</p> <p>12 A. And I was explaining why it was a smaller 13 section whereas usually it is a large section course 14 with over a hundred in each section.</p> <p>15 Q. And I appreciate that, but that's not really 16 what I asked.</p> <p>17 A. Okay. I understand.</p> <p>18 Q. Okay. How many sections were taught of 19 classical mythology last fall?</p> <p>20 A. Three or four.</p> <p>21 Q. Who else taught it besides you?</p> <p>22 A. Joann Gulizio who is a lecturer in the 23 department.</p> <p>24 Q. Joann Gulizio?</p> <p>25 A. Uh-huh.</p>	<p style="text-align: right;">Page 29</p> <p>1 version of CC301, which is our introduction to ancient 2 Greeks.</p> <p>3 Q. And what classes are you teaching this 4 semester?</p> <p>5 A. Well, the spring semester is finished.</p> <p>6 Q. Okay. Fair enough. What classes did you teach 7 the spring semester that just finished?</p> <p>8 A. Classical mythology.</p> <p>9 Q. All right. Same deal?</p> <p>10 A. One -- one small section.</p> <p>11 Q. One small section, 40 students, all virtual?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And you continued to work on developing 14 what now for the University?</p> <p>15 A. A new online version of a different class that 16 is also usually a large lecture course. Our department 17 is trying to develop more online classes to give those 18 students who prefer that mode of instruction, the 19 opportunity to learn that way and take the course from 20 home.</p> <p>21 Q. Kind of like University of Phoenix?</p> <p>22 A. Uh-huh. Yes. That's right. That's right. It 23 is something that a lot of universities are doing right 24 now.</p> <p>25 Q. Who is your current teaching assistant?</p>

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<p style="text-align: right;">Page 30</p> <p>1 A. I don't have one. Teaching assistants are only 2 assigned to large sections.</p> <p>3 Q. When is the last time you had a teaching 4 assistant?</p> <p>5 A. In the fall of 2019.</p> <p>6 Q. And who was your teaching assistant in the fall 7 of 2019?</p> <p>8 A. There were two of them, John Anderson and Alain 9 Zaramian.</p> <p>10 Q. John Anderson, I think I can get that one. 11 What was the second one?</p> <p>12 A. Alain, A-L-A-I-N. Zaramian, Z-A-R-A-M-I-A-N.</p> <p>13 Q. And these are graduate students in classics?</p> <p>14 A. Yes.</p> <p>15 Q. And where are they now?</p> <p>16 A. They are still in the graduate program. 17 Although, Alain is finishing his degree this summer.</p> <p>18 Q. And you have not had any teaching assistants 19 since the publication of the flyer in November of 2019; 20 is that true?</p> <p>21 A. Well, I continued to have the teaching 22 assistants in December of 2019, but not since then 23 because I don't even teach in small courses.</p> <p>24 Q. At the University, who do you supervise?</p> <p>25 A. I have three doctoral students completing their</p>	<p style="text-align: right;">Page 32</p> <p>1 that was directly concerned with that.</p> <p>2 Q. An undergraduate thesis?</p> <p>3 A. Yes, an -- yeah, an undergraduate honors 4 thesis.</p> <p>5 Q. All right. We will get to that. Any other 6 graduate thesis that you have supervised on Greek 7 sexuality.</p> <p>8 A. No, I don't believe so. I mean, we used to 9 have masters thesis, but I think those that I supervised 10 were all on different topics.</p> <p>11 Q. And have you ever supervised either a doctoral 12 or a graduate super -- let me start over. Have you ever 13 supervised a graduate or doctoral thesis on any sort of 14 homosexual studies?</p> <p>15 A. No.</p> <p>16 Q. Other than your students -- well, talk to me 17 about that the senior thesis that you supervised on 18 Greek sexuality.</p> <p>19 A. Uh-huh.</p> <p>20 Q. Tell me about that.</p> <p>21 A. The student's name was Brian Brennan, and he 22 went on to do a master's degree at the University of 23 Wisconsin. He was originally planning to be a computer 24 science major, but during his freshman year he took a 25 freshman signature course with me on sexuality politics</p>
<p style="text-align: right;">Page 31</p> <p>1 dissertations under my supervision, Alain Zaramian is 2 one of them. Do you want the names of the others?</p> <p>3 Q. Sure.</p> <p>4 A. Michael Mignanelli and Becky Kahane.</p> <p>5 Q. And how do you spell Michael's last name?</p> <p>6 A. M-I-G-N-A-N-E-L-L-I.</p> <p>7 Q. And Becky?</p> <p>8 A. K-A-H-A-N-E.</p> <p>9 Q. Also classic students?</p> <p>10 A. Yes, all three of them.</p> <p>11 Q. And when is -- when is their doctorate 12 expected?</p> <p>13 A. Alain will defend this summer. Becky will 14 defend in the next fall semester. Michael, I am not so 15 sure about. His progress has been -- I mean, he started 16 later than the others, and his progress has not been as 17 rapid.</p> <p>18 Q. Are any of the doctoral student's thesis on 19 subjects of Greek sexuality?</p> <p>20 A. No.</p> <p>21 Q. Have you supervised any doctoral students on 22 writing thesis or a thesis on Greek sexuality.</p> <p>23 A. Not at the doctoral level.</p> <p>24 Q. On any other level?</p> <p>25 A. There was a senior thesis that I supervised</p>	<p style="text-align: right;">Page 33</p> <p>1 and human rights and was so fascinated by the material, 2 which did include a bit of Greek material, that he 3 decided to take ancient Greek and liked it and decide to 4 become a classics major instead of a computer scientist.</p> <p>5 Q. And what was his senior thesis on Greek 6 sexuality as you recall?</p> <p>7 A. I don't recall the exact title, but it did have 8 to do with, you know, Greek pederasty, which is the 9 predominant form of Greek homosexuality, although not 10 the only form.</p> <p>11 Q. Say that again.</p> <p>12 A. It is the predominant form, but not the only 13 form of Greek homosexuality.</p> <p>14 Q. Pederasty?</p> <p>15 A. And I should -- I should -- yes. I should 16 revise my previous statement. There was also another 17 senior honors thesis in addition to Brian's written by 18 Kathleen Kitter. And although it was not directly on 19 sexuality per say, it dealt with some poems of 20 theocratist that were pederastic in nature.</p> <p>21 Q. Does -- at U.T., have you ever served as an 22 academic advisor?</p> <p>23 A. No.</p> <p>24 Q. Why not?</p> <p>25 A. Our department is a very factualized and</p>

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<p style="text-align: right;">Page 34</p> <p>1 dysfunctional department, which has -- used to be one of 2 the top ten graduate programs in the nation, used to be 3 the largest classics department in the United States 4 with 25 faculty lines. Next year we will be down to 12 5 faculty lines.</p> <p>6 Q. What is a faculty line?</p> <p>7 A. A tenure stream. In other words, tenure track 8 or tenured, an actual professorial line as opposed to a 9 lectureship.</p> <p>10 Q. Understood. So at the time you came to the 11 department in 1988, there were 25 professorial lines?</p> <p>12 A. No. I think at that time they were 18, and 13 eventually we gained new positions and built up to 25.</p> <p>14 So 25 would be what we would have had around 2000.</p> <p>15 Q. All right. And then since 2000, your 16 professional lines have been reduced to half?</p> <p>17 A. Yes, approximately.</p> <p>18 Q. And mechanically, how was that done?</p> <p>19 A. Every time someone leaves, whether it due to 20 retirement or a job offer at another institution, the 21 position goes back to the University to reallocate as 22 they see fit. And at least two of the former deans of 23 our college felt that the department was so badly 24 dysfunctional they felt it did not deserve to have those 25 lines renewed, and they instead reassigned them to</p>	<p style="text-align: right;">Page 36</p> <p>1 the classics department at U.T.?</p> <p>2 A. Oh, yes. People in the hegemonic faction try 3 to blame it on me.</p> <p>4 Q. What does hegemonic mean?</p> <p>5 A. The leadership faction.</p> <p>6 Q. Okay. So the leaders have tried to blame you 7 for it? What have they said?</p> <p>8 A. They have accused me of being disruptive, by 9 which they mean that I am very critical of their 10 leadership and policies. I mean, in addition to their 11 refusing that endowment, there have been several cases 12 where productive colleagues had outside job offers, and 13 they refused to match the offers. And, again, I was in 14 favor of doing so. I mean, in the words of one of my 15 colleagues, the former department chair of Karl Galinsky 16 who was chair for 16 years and was largely responsible 17 for building up the department, they were using their 18 allegation against me as a smokescreen to cover up their 19 own deficiencies as leaders.</p> <p>20 Q. We are going to mark some exhibits here today.</p> <p>21 A. Uh-huh.</p> <p>22 (Exhibit 1 marked.)</p> <p>23 Q. (BY MR. PRINGLE JR.) I am handing you what is 24 marked as Exhibit 1, and ask if you have seen this 25 before. You may take a moment to look at it.</p>
<p style="text-align: right;">Page 35</p> <p>1 better functioning departments. And among other things, 2 our department refused a \$5 million in down share. And, 3 you know, there was prospect that the same donors would 4 give the University tons of millions of dollars. So I 5 think that really angered the dean at the time. And as 6 a result of our refuse -- I mean, I was very much in 7 favor of our accepting that endowment, as were several 8 of my colleagues, but we were, at the end of the day, a 9 minority. It was an endowed share in biblical Greek, 10 and, you know, some of my colleges are very strongly 11 antireligious or at least antichristian, and they did 12 not want to see development in that direction.</p> <p>13 Q. Do you take any responsibility for the 14 dysfunction in the department?</p> <p>15 A. No, because I have not been in a leadership 16 position in the department. The responsibility for the 17 dysfunction is with the people that have been leading 18 the department.</p> <p>19 Q. You think dysfunction is created at the top of 20 the department?</p> <p>21 A. Yes.</p> <p>22 Q. So you take no responsibility?</p> <p>23 A. No. I mean I have warned against the 24 consequences of decisions like refusing that endowment.</p> <p>25 Q. Has anyone ever faulted you for dysfunction in</p>	<p style="text-align: right;">Page 37</p> <p>1 A. Yes. I have seen this before.</p> <p>2 Q. Is this indicative of the criticisms of you --</p> <p>3 A. Very -- very much so.</p> <p>4 Q. I wasn't finished.</p> <p>5 A. Sorry. Sorry.</p> <p>6 Q. Is this indicative of the criticisms of you 7 being a seriously disruptive and destructive force in 8 the classics department in the University?</p> <p>9 MR. SIBLEY: Objection. Form.</p> <p>10 A. Yes, this is -- this is the kind of 11 argumentation they used.</p> <p>12 Q. (BY MR. PRINGLE JR.) All right. And how did 13 you come to see Exhibit 1 before?</p> <p>14 A. Through an open records request.</p> <p>15 Q. All right. And is Exhibit 1 indicative of some 16 of the complaints that were made about you by others in 17 the department?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Is it indicative of your reputation in 20 the department?</p> <p>21 A. My reputation among some members of the 22 department.</p> <p>23 Q. All right.</p> <p>24 A. But I also had allies.</p> <p>25 Q. You also had what?</p>

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<p>1 A. Allies.</p> <p>2 Q. Allies?</p> <p>3 A. Who saw this for what it was.</p> <p>4 Q. But certainly you would agree that your 5 reputation in the department of classics, it was 6 somewhat controversial over the years?</p> <p>7 MR. SIBLEY: Objection. Form.</p> <p>8 A. Inasmuch as I have been highly critical of the 9 department's leadership, they presented that, and 10 basically try to manufacture charges against me. But I 11 would also say that I filed complaints against them with 12 equal opportunity services and with the committee of 13 Counsel on Academic Freedom and Responsibility. The 14 Committee on Academic Freedom and Responsibility found 15 in my favor, and it was largely based on that, that the 16 same dean to whom this memo is addressed took steps to 17 vastly increase my salary, give me a named 18 professorship, and ultimately restore me to the 19 department with full voting privileges. And he also 20 brought the term of this department chair to an end, 21 which was one of my central demands and prematurely.</p> <p>22 Q. Anything about what the department did in 23 response to this complaint in 2009.</p> <p>24 A. I --</p> <p>25 Q. I wasn't finished.</p>	<p>Page 38</p> <p>1 me, I would say he remained hostile. The -- his 2 successor as department chair, who is the present 3 department chair, was, at least initially, in the early 4 part of her term very cooperative. But in light of the 5 events that ensued following the defendant's actions, 6 she started to become very uncooperative.</p> <p>7 Q. So is it fair to say that within the classics 8 department many of the members of the faculty are hostile 9 to you?</p> <p>10 MR. SIBLEY: Objection. Form.</p> <p>11 A. Some.</p> <p>12 Q. (BY MR. PRINGLE JR.) How many?</p> <p>13 A. I really cannot speak to people's subjective 14 feelings. I do not know how many would call themselves 15 hostile and how many simply don't want to challenge the 16 hegemonic faction for their own benefit. I mean, 17 obviously, they don't want to be mistreated and 18 retaliated against. I mean, there is -- there is a 19 sense of herd mentality even among academics who ought 20 to be more independent.</p> <p>21 MR. PRINGLE JR.: Objection.</p> <p>22 Nonresponsive.</p> <p>23 Q. (BY MR. PRINGLE JR.) Do you remember what my 24 question was?</p> <p>25 A. How many. And I told you I did not know.</p>
<p>1 A. Oh, I am sorry. I thought --</p> <p>2 Q. Anything that was done by the department head 3 2009 ever do anything to restore your reputation among 4 your colleagues?</p> <p>5 MR. SIBLEY: Objection. Form.</p> <p>6 A. Did the department do anything to restore my 7 reputation? No, not really, but the dean did.</p> <p>8 Q. (BY MR. PRINGLE JR.) Did your reputation 9 change, if you know?</p> <p>10 A. I think among some of the more neutral members 11 of the faculty, it may have done so as a result of my 12 being brought back into the department with full voting 13 privileges.</p> <p>14 Q. But your critics continue to pursue in the 15 department; is that true?</p> <p>16 A. Yes. Subsequent to 2009 when I came up for 17 post-tenure review, I think was around 2011, they did 18 try to submit a negative post-tenure review even though 19 I had published 19 articles in the six years perceiving 20 that. And, again, it was based on these charges of my 21 being disruptive because I had taken different sides in 22 a couple of tenure cases, and, you know, other 23 policy-related issues. So I would certainly say that 24 this particular department chair who ceased to be the 25 department chair after the dean made a settlement with</p>	<p>Page 39</p> <p>1 Q. Okay.</p> <p>2 A. And I cannot read people's minds.</p> <p>3 Q. Okay. Who are the ones that you perceive to be 4 hostile to you in the department now?</p> <p>5 A. The hegemonic faction ago that I have been 6 referring to consisted of four people who were Steve 7 White, this chairman; Leslie Dean Jones, the present 8 chairman; Andrew Riggsby, who is for a long time the 9 graduate advisor and chair of the graduate study's 10 committee; and Paula Perlman, who is now retiring. 11 Although, I would say since her decision to retire, 12 Perlman has basically removed herself from the 13 departmental politics, and I think is perhaps less 14 hostile than she perhaps was at one time.</p> <p>15 Q. Maybe doesn't care anymore?</p> <p>16 A. I think that may be an element, but, again, I 17 am speculating.</p> <p>18 Q. Yeah. And of the four that you have identified 19 as hostile to you in the classics department, how many 20 people -- how many faculty members are in the classics 21 department?</p> <p>22 A. Two of them are retiring at the end of this 23 year, and one of them is attempting to have her line 24 moved to another department. And then we have made one 25 new hire, so we will have 12 next fall. Right at this</p>

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<p style="text-align: right;">Page 42</p> <p>1 point, it would be 14. Again, two are retiring, one is 2 moving.</p> <p>3 Q. So just shy of a third of the faculty is 4 hostile to Tom Hubbard in the classics department?</p> <p>5 A. I think that's probably right.</p> <p>6 Q. And who were your allies in the classics 7 department?</p> <p>8 A. Karl Galinsky who has been retired.</p> <p>9 Q. Active faculty.</p> <p>10 A. Huh?</p> <p>11 Q. Active faculty. Who are --</p> <p>12 A. Oh, who are still in the department?</p> <p>13 Q. Yeah. Tell me your allies that are active 14 faculty in the classics department.</p> <p>15 A. Well, in some ways, Jennifer Ebbeler, but she 16 herself is engaged in a lawsuit against the University, 17 largely due to conflicts she has had with the department 18 chair. And she was not always an ally. I opposed her 19 tenure, and she knew that. So, you know, we have not 20 always been allies, but more recently I think she and I 21 have come to agree that the department is poorly led and 22 that our graduate program has ceased to be the 23 high-quality program it used to be.</p> <p>24 Q. Okay. So Jennifer Ebbeler you believe is one 25 of your allies, current faculty member in classics?</p>	<p style="text-align: right;">Page 44</p> <p>1 in fact had not made a job offer. They had interviewed 2 her, and she was one of only two candidates, the other 3 also being a member of our department. But when the 4 first one turned them down, she thought she was going to 5 get the job, but in fact she did not.</p> <p>6 Q. So then do you have any allies in the classics 7 department that you would consider to be honest people?</p> <p>8 A. To the extent that Palaima is perhaps somewhat 9 sympathetic and understanding of my position, I have no 10 reason to think he is dishonest.</p> <p>11 Q. And he is retiring?</p> <p>12 A. Yes.</p> <p>13 Q. What is the role of an academic advisor?</p> <p>14 A. The term "academic advisor" usually refers to 15 staff and not faculty.</p> <p>16 Q. What is a faculty advisor role?</p> <p>17 A. Well, we do have both, an undergraduate and 18 graduate advisor.</p> <p>19 Q. And I asked you earlier --</p> <p>20 A. And --</p> <p>21 Q. I am sorry. Go ahead.</p> <p>22 A. The graduate advisor meets briefly with each of 23 the graduate students each semester when they are doing 24 their course planning for the next semester. So he 25 meets only with those students who are doing active</p>
<p style="text-align: right;">Page 43</p> <p>1 A. Uh-huh.</p> <p>2 Q. Anybody else?</p> <p>3 A. None of them that are willing to talk with me 4 about the current state of the department. Although, I 5 do believe that Tom Palaima, who is one of the two 6 retiring faculty in addition to Perlman, is more 7 sympathetic than some of the others. But you see, most 8 of my allies have been chased out of the department.</p> <p>9 MR. PRINGLE JR.: Objection.</p> <p>10 Nonresponsive.</p> <p>11 Q. (BY MR. PRINGLE JR.) Jennifer Ebbeler, your 12 ally in the classics department, you've had your 13 differences with her?</p> <p>14 A. Oh, yes.</p> <p>15 Q. But you consider herself to be an upright 16 person?</p> <p>17 A. Not entirely.</p> <p>18 Q. Okay. Do you consider her to be an honest 19 person?</p> <p>20 A. I think there was some real questions 21 surrounding the claim of an outside job offer from the 22 University of Southern California where I believe that 23 the evidence suggest that she was not truthful about 24 receiving that job offer or about the salary of this 25 opposing job offer, as it was later discovered that USC</p>	<p style="text-align: right;">Page 45</p> <p>1 coursework, not the students who are at dissertation 2 level. And at this point, I would say we have fewer 3 than 15 students doing coursework. So it is not that 4 many students that the graduate advisor meets with, and 5 the current graduate advisor basically just approves 6 whatever they want and really doesn't do much.</p> <p>7 Q. The undergraduate advisor meets with majors, if 8 they want to meet with him, but his approval of their 9 course choices is not required. Most undergraduates 10 meet with the staff member who does academic advisement?</p> <p>11 And is that -- is that Susan Summers now?</p> <p>12 A. Yes.</p> <p>13 Q. And she is faculty -- faculty member?</p> <p>14 A. No. She is a staff.</p> <p>15 Q. All right. And I asked you earlier if you ever 16 served as -- I thought I asked if you'd ever served as 17 an academic advisor, and you said you had not, correct?</p> <p>18 A. Unless you mean as academic advisor, the 19 director of dissertation or masters thesis. I certainly 20 have served in that capacity, but I have never been the 21 undergraduate or graduate advisor.</p> <p>22 Q. And that was because -- you attributed that to 23 the leadership being bias against you?</p> <p>24 A. I am paraphrasing.</p> <p>25 Q. Yes. There is a certain -- I mean, the four</p>

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<p style="text-align: right;">Page 46</p> <p>1 people that I identified as the hegemonic faction were 2 all the prodigies of a certain former department chair 3 who for various reasons did not like me because I was 4 not as enthusiastic about his prodigies as he was.</p> <p>5 Q. And as the academic advisor to undergraduates, 6 that's the role where the faculty member meets with the 7 undergraduates if they desire, majors?</p> <p>8 A. Yeah, right. And the majority of them did not 9 meet with him.</p> <p>10 Q. Okay. That's --</p> <p>11 A. And it's really sinecure.</p> <p>12 Q. And that's -- and you have not been asked to 13 serve in that capacity, correct?</p> <p>14 A. No.</p> <p>15 Q. All right. Has anyone ever articulated 16 justification for you not serving in that capacity 17 because they are concerned that you would run off majors 18 or run off students?</p> <p>19 A. That has never been alleged as their reasons.</p> <p>20 Q. What were their reasons?</p> <p>21 A. Well, Steve White, the chair who wrote this 22 memorandum that you presented as Exhibit 1 as part of 23 his dossier the dean asked him to compile, said that, 24 well, because all these reasons we cannot possibly ask 25 him to serve in these jobs. But of course, none of</p>	<p style="text-align: right;">Page 48</p> <p>1 never documented that. His sole documentation was a 2 statement from Robert Caster at Princeton who was one of 3 the three external reviewers of the department when it 4 had its mandatory external review, which, you know, 5 departments are asked to do approximately every ten 6 years. And in the course of that review, this faction 7 tried to blame all of the department's problems on me. 8 I was in Germany at the time of the review, so I was not 9 able to meet with these reviewers. There was a 10 subsequent e-mail about -- from Caster to this 11 department chair in which he asked, why haven't you 12 gotten rid of Tom Hubbard yet. But his sole impression 13 is what he had been told by that faction without having 14 discussed it with me. Once I became aware of Caster's 15 e-mail under an open records request, I e-mailed him 16 myself and said, what is the basis for your thinking 17 this. And he admitted that it was solely on the basis 18 on what he had been told by Steve White and other 19 members of that faction whom he trusted. He said that 20 he had not heard anything from any of his students at 21 Princeton to this effect. And we have had 22 undergraduates who went into the graduate program at 23 Princeton. And I remember Jake Mackey, and, you know, 24 Caster said that he had not heard anything negative 25 about me from them, nor from Larry Kim who was an</p>
<p style="text-align: right;">Page 47</p> <p>1 these reasons had anything to do with my actual 2 competence to serve on the jobs, and I do not recall 3 there being because of any statement that I would run 4 people off.</p> <p>5 Q. Well, there is a statement on Page 3 that you 6 have a history of bullying students that has been widely 7 known in the profession?</p> <p>8 MR. SIBLEY: Objection. Form.</p> <p>9 Q. (BY MR. PRINGLE JR.) That was alleged, 10 correct?</p> <p>11 MR. SIBLEY: Objection. Form.</p> <p>12 A. Well, he may have alleged that. Now, part of 13 the file that you should have seen was a detailed 14 response amounting to close to 500 pages with all the 15 exhibits in which I refuted every single one of the 16 charges this department chair made. And that is part of 17 the reason why the dean ultimately gave me a huge salary 18 increase and restored me to the department and told this 19 department chair that he should not continue. If I may, 20 I would like to review the paragraph --</p> <p>21 Q. Sure. Please do.</p> <p>22 A. -- that you allude to. Is this 4A?</p> <p>23 Q. Indeed.</p> <p>24 A. Okay. His history of bullying students has 25 become widely known in the profession. Okay. White</p>	<p style="text-align: right;">Page 49</p> <p>1 assistant professor in our department who was denied 2 tenure and was a Princeton Ph.D. and kept in touch with 3 people at Princeton. So the two people who were at 4 Princeton who actually knew something about our 5 department had never said anything negative about me at 6 all. Caster's impression was solely based on what he 7 heard during his visit as an external reviewer.</p> <p>8 MR. PRINGLE JR.: Objection.</p> <p>9 Nonresponsive.</p> <p>10 Q. (BY MR. PRINGLE JR.) I thought you were going 11 to read that slightly to yourself. That's what you 12 asked to do, is you wanted to review the paragraph. Go 13 ahead and review. Just review it, but I am not asking 14 you a question right now.</p> <p>15 A. Well, he also says --</p> <p>16 Q. I haven't asked you a question yet. Have you 17 reviewed the paragraph?</p> <p>18 A. (Complying.) Yes. I have reviewed the 19 paragraph.</p> <p>20 Q. Can we agree that there is an allegation you 21 have a history of bullying students that's been widely 22 known in the profession?</p> <p>23 MR. SIBLEY: Objection. Form.</p> <p>24 A. The sole documentation, which is --</p> <p>25 Q. (BY MR. PRINGLE JR.) I didn't ask you about</p>

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<p style="text-align: right;">Page 50</p> <p>1 the documentation. Can we agree that there's that 2 allegation?</p> <p>3 MR. SIBLEY: Objection. Form.</p> <p>4 A. From Robert Caster and Robert Caster only, and 5 I have explained where Caster came up with that. It was 6 not directly from any student who has ever worked with 7 me.</p> <p>8 Q. All right.</p> <p>9 A. And --</p> <p>10 Q. Is --</p> <p>11 A. May I continue?</p> <p>12 Q. Well, I haven't really asked you a question.</p> <p>13 A. Well, you did ask a question about whether 14 there was this reputation in the profession.</p> <p>15 Q. No. That's not the question that I asked, sir. 16 Listen very closely to my question. It's important you 17 understand the question that I am asking you so you can 18 answer that question. Okay?</p> <p>19 A. I thought you asked, did I have reputation of 20 bullying in the profession.</p> <p>21 Q. No, that's not what I asked. You need to 22 listen very closely to my question. Can we agree that 23 there's an allegation that you had a history of bullying 24 students that's widely known in the profession?</p> <p>25 MR. SIBLEY: Objection. Form.</p>	<p style="text-align: right;">Page 52</p> <p>1 Larry Kim was denied tenure, Andrew Faulkner had an 2 outside job offer that was not matched, Edward Boucher 3 whom we pointed at the senior level was so disgusted 4 that he left after two years.</p> <p>5 MR. PRINGLE JR.: Objection.</p> <p>6 Nonresponsive.</p> <p>7 Q. (BY MR. PRINGLE JR.) So you don't know whether 8 that statement is true or not?</p> <p>9 A. At the time that this was written in 2018, I 10 was not on the admissions committee, so I can't attest 11 one way or the other.</p> <p>12 Q. So you don't know if the reason that 13 applications in your area, Greek poetry, especially from 14 strong programs, have fallen off considerable in recent 15 years because you were the sole specialist in that area?</p> <p>16 MR. SIBLEY: Objection. Form.</p> <p>17 Q. (BY MR. PRINGLE JR.) You don't know that, do 18 you?</p> <p>19 MR. SIBLEY: Objection. Form.</p> <p>20 A. I can only speculate, and I just explained to 21 you that having only one faculty member in that area as 22 opposed to Latin literature where we had several 23 faculty, is the more likely explanation than anything to 24 do directly with me.</p> <p>25 Q. (BY MR. PRINGLE JR.) And that's pure</p>
<p style="text-align: right;">Page 51</p> <p>1 A. Steve White does make that allegation.</p> <p>2 Q. Okay. The next sentence says, applications in 3 your area of Greek poetry, especially from strong 4 programs, has fallen off considerable in recent years as 5 faculty attrition has left him our sole specialist in 6 that area; is that true? That's a yes or no question.</p> <p>7 MR. SIBLEY: Objection. Form.</p> <p>8 A. I would like to answer with a more detailed 9 response than yes or no.</p> <p>10 Q. (BY MR. PRINGLE JR.) First tell me --</p> <p>11 A. May I?</p> <p>12 Q. First tell me if it is true or not?</p> <p>13 MR. SIBLEY: Objection. Form.</p> <p>14 A. I don't really know as I was not on the 15 admission's committee.</p> <p>16 Q. (BY MR. PRINGLE JR.) Okay. If you don't know, 17 you don't know.</p> <p>18 A. But I would like to add to that. That the fact 19 of their being only one specialist in that area is 20 itself the explanation whereas we previously had several 21 people specializing in that area. Having one person in 22 Greek literature is not typical for graduate programs in 23 classics.</p> <p>24 Q. So --</p> <p>25 A. The other people who specialized, I mean,</p>	<p style="text-align: right;">Page 53</p> <p>1 speculation on your part, isn't it?</p> <p>2 MR. SIBLEY: Objection. Form.</p> <p>3 A. Your question only called for speculation since 4 I do not -- I do not have the data on which this 5 statement is made.</p> <p>6 Q. (BY MR. PRINGLE JR.) Okay. Prospective 7 students visiting the department often voice concerns 8 about working with him, Tom Hubbard; is that true?</p> <p>9 A. They haven't voiced them to me.</p> <p>10 Q. That's not my question. Do you know if 11 prospective students visiting the department how often 12 voiced concerns about working with you?</p> <p>13 A. No, I do not.</p> <p>14 Q. Okay. Have you --</p> <p>15 A. But the fact that the dean ultimately did not 16 give credence to White's charges, you know, made a very 17 generous settlement with me and asked this department 18 chair to step down should impeach the credibility of 19 what this department chair says.</p> <p>20 Q. With all due respect, Professor --</p> <p>21 MR. PRINGLE JR.: Objection nonresponsive.</p> <p>22 Q. (BY MR. PRINGLE JR.) You just don't know 23 whether prospective students have voiced concerns about 24 working with you?</p> <p>25 A. I have seen no --</p>

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<p style="text-align: right;">Page 54</p> <p>1 MR. SIBLEY: Objection. Form.</p> <p>2 A. I have seen no evidence to that effect.</p> <p>3 Q. (BY MR. PRINGLE JR.) Okay. Did you ask the</p> <p>4 dean, Randy Diehl, or the -- or the chair of the</p> <p>5 classics department whether that's true?</p> <p>6 A. Not that I remember, but he has not presented</p> <p>7 any documentation of that effect.</p> <p>8 Q. If you got a copy of an e-mail or report that</p> <p>9 prospective students voiced concerns about working with</p> <p>10 you, why in the world didn't you ask, give me some</p> <p>11 details on that so I can correct my behavior?</p> <p>12 MR. SIBLEY: Objection. Form.</p> <p>13 Q. (BY MR. PRINGLE JR.) Why didn't you do that?</p> <p>14 MR. SIBLEY: Objection. Form.</p> <p>15 A. I only received a copy of this in my open</p> <p>16 records request, which was some years later, and, you</p> <p>17 know, was part of my filing a grievance against that</p> <p>18 chair, so he was hardly likely to talk to me about it.</p> <p>19 Q. (BY MR. PRINGLE JR.) Now, Professor, you saw</p> <p>20 this when you responded to this, didn't you?</p> <p>21 A. Yes, that was at the time of filing a grievance</p> <p>22 against that chair.</p> <p>23 Q. Are you telling me that you had no opportunity</p> <p>24 to respond to this?</p> <p>25 A. I did in the -- in the complaint to the</p>	<p style="text-align: right;">Page 56</p> <p>1 A. Oh, no, of course I care.</p> <p>2 Q. If you cared that people were -- prospective</p> <p>3 students visiting the department voiced concerns about</p> <p>4 working with you. If you cared, why didn't you ask any</p> <p>5 questions?</p> <p>6 MR. SIBLEY: Objection. Form.</p> <p>7 A. I think that in my response to this I did point</p> <p>8 out that this was a charge made with no evidence.</p> <p>9 Q. (BY MR. PRINGLE JR.) How do you know? You</p> <p>10 didn't ask.</p> <p>11 A. My opinion at the time was if there was actual</p> <p>12 evidence he would have provided it as part of this</p> <p>13 dossier or the subsequent dossier that he submitted as</p> <p>14 part of the post-tenure review process. I, myself, was</p> <p>15 never made aware of this document here until after the</p> <p>16 post-tenure review. And it was only at that point that</p> <p>17 he actually gave me a detailed document outlining his</p> <p>18 charges against me.</p> <p>19 Q. You must have been aware of it because you</p> <p>20 responded to it, though; isn't that right?</p> <p>21 MR. SIBLEY: Objection. Form.</p> <p>22 A. Yes. I responded to it in the form of a</p> <p>23 complaint to the Committee of Counsel on Academic</p> <p>24 Freedom and Responsibility. And my complaint was</p> <p>25 upheld --</p>
<p style="text-align: right;">Page 55</p> <p>1 committee of counsel on academic freedom and</p> <p>2 responsibility, and the committee upheld my complaint.</p> <p>3 MR. PRINGLE JR.: Objection.</p> <p>4 Nonresponsive.</p> <p>5 Q. (BY MR. PRINGLE JR.) When you found out about</p> <p>6 it, why didn't you do anything to investigate whether it</p> <p>7 was true that students don't want to work with you?</p> <p>8 A. I did not expect to receive an honest response</p> <p>9 from this department chair.</p> <p>10 Q. But you didn't even -- you didn't even see what</p> <p>11 the response was to see if it was honest or not?</p> <p>12 A. He presented no documentation. He never named</p> <p>13 any prospective students.</p> <p>14 Q. And you never asked him, did you?</p> <p>15 A. He and I were hardly on speaking terms at</p> <p>16 that point. I -- if I had demanded documentation, he</p> <p>17 would not have provided it, in my opinion.</p> <p>18 Q. Now, Professor, that would be a great response</p> <p>19 if I asked you if y'all were on speaking terms, but I</p> <p>20 just asked you if you never asked him any details about</p> <p>21 who was complaining they didn't want to work with you,</p> <p>22 you never asked him?</p> <p>23 A. I didn't ask and no details were ever provided</p> <p>24 in any of his documentation.</p> <p>25 Q. Was that because you didn't care?</p>	<p style="text-align: right;">Page 57</p> <p>1 MR. PRINGLE JR.: Objection --</p> <p>2 A. -- that this was a misuse of the post-tenure</p> <p>3 review process.</p> <p>4 MR. PRINGLE JR.: Objection.</p> <p>5 Nonresponsive.</p> <p>6 Q. (BY MR. PRINGLE JR.) Did you know Leoda</p> <p>7 Anderson?</p> <p>8 A. Yes. I remember Leoda.</p> <p>9 Q. And who was she?</p> <p>10 A. She was the departmental secretary when I first</p> <p>11 came to the department. I believe she retired around</p> <p>12 1990, and I really didn't see much of her since then,</p> <p>13 but I did hear she had recently died at the age of 103.</p> <p>14 Q. And did you supervise Leoda?</p> <p>15 A. No.</p> <p>16 Q. As a faculty member at the University of</p> <p>17 Texas -- well, let me ask you this. Describe for me if</p> <p>18 you would your division of labor or division of efforts,</p> <p>19 however you want to characterize it, between your</p> <p>20 working for the foundation, versus working for U.T. Is</p> <p>21 that question clear?</p> <p>22 A. Yes. Well, the foundation was only</p> <p>23 incorporated in 2013.</p> <p>24 Q. Okay.</p> <p>25 A. And in the early years, it was very small. We</p>

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<p style="text-align: right;">Page 58</p> <p>1 were largely just a program of providing books and 2 educational materials to prisoners. That, you know, was 3 our main activity. Although, we did have the -- and 4 these were largely, but not exclusively gay prisoners. 5 And, you know, outreach to prisoners has been common in 6 gay activist communities going back to the 1970s, 7 although not so much recently.</p> <p>8 So I would say that in the early years this 9 would have been a fairly minor set of commitment. In 10 the last few years, it has become more of a commitment. 11 The department and university have been fully informed 12 of my work with the foundation. I have even been 13 praised for it in the annual review letters that the 14 chair has written.</p> <p>15 Part of our -- I mean, we have three basic 16 duties as professors, teaching, scholarship, and 17 service. And that service can be service to the 18 universities, such as serving on committees or serving 19 in academic advisor positions. But the service can also 20 be service to the profession by serving in capacities 21 with professional organizations as I have done, or it 22 can be national or even international service. And 23 certainly working with a 501(c)(3) that does educational 24 work and academic research is a form of national 25 service. So I have always listed that on my annual</p>	<p style="text-align: right;">Page 60</p> <p>1 scholarship, and I certainly spend a lot of time on 2 that. So if the question is how much is the division 3 between the foundation and my other duties with the 4 University, I would say right now it is probably about 5 50/50.</p> <p>6 Q. Okay. Fair enough.</p> <p>7 A. But in previous years it would have been less 8 than that, and previous years when I had a full-time 9 teaching schedule and when the foundation was smaller.</p> <p>10 Q. So roughly 50/50 now between the foundation and 11 your obligations with the University?</p> <p>12 A. Yes.</p> <p>13 Q. All right. And your obligations with the 14 University you mentioned the three things, teaching, 15 scholarship, and service, correct?</p> <p>16 A. Uh-huh. Uh-huh.</p> <p>17 Q. Yes?</p> <p>18 A. Yes.</p> <p>19 Q. You need to say yes, remember for her.</p> <p>20 A. I remember. Not inarticulate guttural 21 utterances.</p> <p>22 Q. Right.</p> <p>23 A. I will try not to stay uh-huh anymore.</p> <p>24 Q. We all slip into them, but it is normal, but 25 she does need to make a record, so --</p>
<p style="text-align: right;">Page 59</p> <p>1 reports, and it has been acknowledged in the chair's 2 annual letters of evaluation as being a positive 3 contribution that is consistent with my position at the 4 University. No one has ever complained about my work 5 with the foundation.</p> <p>6 MR. PRINGLE JR.: Objection.</p> <p>7 Nonresponsive.</p> <p>8 Q. (BY MR. PRINGLE JR.) You remember my question?</p> <p>9 A. The division of labor.</p> <p>10 Q. (BY MR. PRINGLE JR.) Yeah. I am looking for 11 like 50/50, 64/40, 90/10.</p> <p>12 A. My response was that it has grown over the 13 years. At first it was relatively -- a relatively small 14 part of my time. In the last two or three years, it has 15 become a more significant part of my time. I would say 16 that in the last year and a half, given that of my 17 teaching has been fairly minimal, it would be a larger 18 percentage of time. But I have never really thought 19 about what percentage of my time.</p> <p>20 Q. Can you give me an idea of percentage of your 21 waking hours you spend with the foundation business 22 versus the University of Texas class that you teach?</p> <p>23 A. If you are talking specifically about the one 24 class I teach, that would be a relatively small 25 percentage of my time. But one of our other duties is</p>	<p style="text-align: right;">Page 61</p> <p>1 So are all three of those prongs, the 2 teaching, scholarship, and service, part of your 3 obligation to the University?</p> <p>4 A. Yes.</p> <p>5 Q. All right. And part of your service obligation 6 is your involvement with the foundation?</p> <p>7 A. National service does come under that heading.</p> <p>8 Q. So is that true that part of your service 9 obligation with the University is your involvement with 10 the William A. Percy Foundation?</p> <p>11 A. I am not obligated to serve with that specific 12 foundation, but it is true that doing service with 13 national organizations is something that the University 14 counts as service and recognizes and it has recognized.</p> <p>15 Q. And that is something that you would tout as 16 fulfillment of your service obligation, your involvement 17 with William A. Percy Foundation, true?</p> <p>18 A. Yes. I have always listed it on my annual 19 review documents, and it has been acknowledged by the 20 department chair as relevant.</p> <p>21 Q. And part of your involvement with the William 22 A. Percy Foundation is the scholarship and the study 23 that you perform there and in your capacity as a 24 representative of the William A. Percy Foundation; is 25 that true?</p>

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<p style="text-align: right;">Page 62</p> <p>1 A. Yes, that is part of it.</p> <p>2 Q. All right.</p> <p>3 A. But not the totality of it.</p> <p>4 Q. No, there is plenty of other --</p> <p>5 A. Sure.</p> <p>6 Q. -- scholarship out there that is not connected</p> <p>7 with the William A. Percy Foundation, true?</p> <p>8 A. Yes, plenty of other scholarship that I write.</p> <p>9 Q. But part of your work with the William A. Percy</p> <p>10 Foundation is scholarly in nature?</p> <p>11 A. Yes, and that includes not only things that I</p> <p>12 write but also supervising the projects of others to</p> <p>13 whom we grant money.</p> <p>14 Q. Okay. Now, the William A. Percy Foundation,</p> <p>15 what is it exactly?</p> <p>16 A. It is a 501(c)(3).</p> <p>17 Q. And its purpose is?</p> <p>18 A. To promote gay rights in areas that tend to be</p> <p>19 neglected by mainstream gay organizations like GLAAD and</p> <p>20 HRC.</p> <p>21 Q. What is HRC?</p> <p>22 A. Human Rights Campaign.</p> <p>23 Q. And what does GLAAD stand for?</p> <p>24 A. Gay and Lesbian Association for Antidefamation</p> <p>25 or something like that.</p>	<p style="text-align: right;">Page 64</p> <p>1 suggest that a lot of that is due to discrimination, but</p> <p>2 it is a form of the discrimination that mainstream</p> <p>3 organizations don't want to talk about.</p> <p>4 Q. Is one the ways that gay rights -- let me start</p> <p>5 over. Is one -- is one of the areas that the William A.</p> <p>6 Percy Foundation addresses the criminal justice issues</p> <p>7 of convicted pedophiles?</p> <p>8 MR. SIBLEY: Objection. Form.</p> <p>9 A. I would say sex offenses more broadly, not just</p> <p>10 pedophilia.</p> <p>11 Q. (BY MR. PRINGLE JR.) Including pedophiles?</p> <p>12 A. Yes. People -- yes, who have been accused of</p> <p>13 that would certainly be among the people that we study.</p> <p>14 Q. Okay.</p> <p>15 A. And that does not in any way mean that we don't</p> <p>16 think they did something wrong. I mean, they did.</p> <p>17 Q. I am not suggesting otherwise. What is</p> <p>18 pedophilia?</p> <p>19 A. The scholarly definition of that term as</p> <p>20 defined in the Diagnostic and Statistical Manual of the</p> <p>21 American Psychiatric Association --</p> <p>22 Q. Well, it's a medical definition, isn't it?</p> <p>23 A. It is a medical and psychological definition,</p> <p>24 and it is widely used by people in the field of</p> <p>25 psychology as well as psychiatry. Is that it refers to</p>
<p style="text-align: right;">Page 63</p> <p>1 Q. Yeah. There are two As?</p> <p>2 A. Yes, there were.</p> <p>3 Q. All right. So the William A. Percy Foundation</p> <p>4 promotes gay rights in areas that underserved by more</p> <p>5 mainstream organizations, fair?</p> <p>6 A. Yes. That is correct. Specifically regard to</p> <p>7 criminal justice issues.</p> <p>8 Q. What sort of criminal justice issues affect gay</p> <p>9 rights?</p> <p>10 A. Gay and lesbian people are incarcerated at</p> <p>11 three times the rate of the general population. I mean,</p> <p>12 that has been well-documented in studies like people</p> <p>13 like Ilan Meyer of the Williams Institute at UCLA. And,</p> <p>14 you know, supportive gay prisoners used to be a signal</p> <p>15 issue among the early gay rights movement in the 1970s.</p> <p>16 But since the 1980s, the strategy of a lot of the</p> <p>17 mainstream big organization has been a simulationist in</p> <p>18 nature, and hence their primary issue became gay</p> <p>19 marriage or gay adoption or equal rights in the</p> <p>20 workplace, which, of course, are now federal law thanks</p> <p>21 to the Supreme Court. So it was issues that make gays</p> <p>22 look respectable in the same as everyone else. And</p> <p>23 they've tended to shy away from any admission that gay</p> <p>24 disproportionately have problems with the law, which</p> <p>25 they do. In our research and the research of others</p>	<p style="text-align: right;">Page 65</p> <p>1 a persistent and dominant attraction to children under</p> <p>2 the age of 10 -- or 10 or below.</p> <p>3 Q. Prepubescent children?</p> <p>4 A. Yes.</p> <p>5 Q. A girl who has not yet menstruated, for</p> <p>6 example?</p> <p>7 A. For example. Now, in the 11 to 13 category,</p> <p>8 that actually has a different term in psychology, which</p> <p>9 is hebephilia. And then most postpuberty, the term is</p> <p>10 ephebophilia, which corresponds to what we call</p> <p>11 pederasty in historical scholarship -- historical and</p> <p>12 anthropological scholarship.</p> <p>13 Q. And all of the phenomenon you just described,</p> <p>14 sexual attraction between adult and the prepubescent</p> <p>15 children, preteen children age 10 to 12 --</p> <p>16 A. Uh-huh.</p> <p>17 Q. -- and underaged children age 14 to 17, below</p> <p>18 the age of consent, true?</p> <p>19 MR. SIBLEY: Objection. Form.</p> <p>20 A. All of those are sex offenses in our -- in</p> <p>21 American law. Although, the age of consent varies by</p> <p>22 state. In the majority of American states it is 16.</p> <p>23 Q. Can you -- can you -- can you point me on to a</p> <p>24 publication besides the DSM that defines pederasty as</p> <p>25 distinct from pedophilia?</p>

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<p style="text-align: right;">Page 66</p> <p>1 A. Not off the top of my head, but I would say 2 that most people who specialize in sexology understand 3 the distinction between these terms, and most 4 classicists understand the difference between these 5 terms.</p> <p>6 Q. Well, the population you've just described I 7 assume is a pretty small sliver of American society, 8 right, classicists and those who study sexology, yes?</p> <p>9 A. It is. I would say the majority of the 10 American population have never heard the word pederasty 11 and probably do not know the difference. But I would 12 say, to the common man on the street, and that is the 13 legal standard that we have to use in cases of 14 defamation, when you say the word "pedophilia" what they 15 think of is someone who molest prepubescent children --</p> <p>16 Q. And what --</p> <p>17 A. 5 year olds or 10 year olds. Now, some people 18 who are very sloppy, like the Defendant, confuse that 19 with talking about adolescent sexuality.</p> <p>20 MR. PRINGLE JR.: Objection.</p> <p>21 Nonresponsive.</p> <p>22 Q. (BY MR. PRINGLE JR.) What evidence do you have 23 that most people on the street consider pedophilia to be 24 the prepubescent children? What evidence do you have?</p> <p>25 A. The fact that people are so horrified by the</p>	<p style="text-align: right;">Page 68</p> <p>1 A. -- and an illegal relationship in certain 2 jurisdictions.</p> <p>3 Q. (BY MR. PRINGLE JR.) Why would -- why would it 4 be classified as inappropriate?</p> <p>5 A. Because it is illegal, and because a lot of 6 people have the misunderstanding that there is some 7 principle of natural law whereby one cannot engage in 8 informed contest below a certain age.</p> <p>9 Q. Okay. I tell you what, we have been going 10 about an hour and 40 minutes. I didn't tell you that 11 any time you want to take a break, we can. If you need 12 to use the restroom, make a phone call, talk to Joe, 13 stretch your legs, get a drink of water, anything like 14 that. You know, mi casa is su casa. You've got 15 facilities, coffee, anything you want. Do you want to 16 take a break?</p> <p>17 A. I don't need to. We can go on for a while, but 18 if others in the room would like to take a break, I am 19 certainly willing to.</p> <p>20 MR. PRINGLE JR.: Well, I am at the will of 21 the majority. Do you want to take a break, Joe?</p> <p>22 MR. SIBLEY: Yeah. Let's take a ten-minute 23 restroom break.</p> <p>24 THE VIDEOGRAPHER: Off the record at 11:40. (Recess taken.)</p>
<p style="text-align: right;">Page 67</p> <p>1 term. Whereas relationships between adolescents are 2 usually not called pedophilia. If two 16 year olds have 3 sexual relations, I do not believe that most people 4 would call that pedophilia, even though it is a 5 relationship with someone who under Texas law is under 6 age.</p> <p>7 Q. Would you agree that setting aside this narrow 8 sliver of classicists and sexologists like yourself, the 9 average man on the street would consider sex between an 10 adult male, say, a 25-year-old male and a 15-year-old 11 boy as being pedophilia?</p> <p>12 A. I do not believe they would use that term. I 13 mean, they might disapprove of it, but I think most 14 people's understanding of pedophilia is molestation of 15 children who are not yet of the age of sexual maturity 16 or understanding.</p> <p>17 Q. What term do you believe the average man on the 18 street, not the classicists or the sexologist like 19 yourself, would use to describe sex between a 20 25-year-old man and a 14 or 15-year-old boy?</p> <p>21 A. Inappropriate.</p> <p>22 Q. I am not going to let you off that easy.</p> <p>23 MR. SIBLEY: Objection. Form.</p> <p>24 A. An inappropriate relationship --</p> <p>25 Q. And how --</p>	<p style="text-align: right;">Page 69</p> <p>1 THE VIDEOGRAPHER: We are back on the 2 record at 11:56. This begins Tape No. 2.</p> <p>3 Q. (BY MR. PRINGLE JR.) Professor, we were 4 talking about the William A. Percy Foundation before we 5 stopped.</p> <p>6 A. Uh-huh.</p> <p>7 Q. And I asked you a little bit about your 8 division of efforts between your faculty position and 9 your William A. Percy Foundation involvement.</p> <p>10 Q. You are the president of the William A. Percy 11 Foundation; is that right?</p> <p>12 A. Yes.</p> <p>13 Q. And how did you become the president?</p> <p>14 A. Essentially, I founded it.</p> <p>15 Q. Okay.</p> <p>16 A. Got Mr. Percy to agree to let us use his name 17 and his famous great-uncle's name.</p> <p>18 Q. All right. So there are actually two William 19 A. Percys, aren't there?</p> <p>20 A. They are.</p> <p>21 Q. All right. And is the younger still alive?</p> <p>22 A. He is 87, but, yes, he still exists.</p> <p>23 Q. Okay. All right. Is that William Armstrong 24 Percy?</p> <p>25 A. Yes, the third.</p>

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<p style="text-align: right;">Page 70</p> <p>1 Q. The third? And the other William A. Percy was 2 his uncle or great-uncle?</p> <p>3 A. I think great-uncle.</p> <p>4 Q. Okay. Does William A. Percy -- William 5 Armstrong Percy, is he still involved with the Percy 6 Foundation?</p> <p>7 A. He has never been involved in any formal 8 capacity, but, you know, we certainly talk to him and 9 let him know what we are doing, and he appreciates it, 10 and he gives us some money.</p> <p>11 Q. All right. Now, does the William A. Percy 12 Foundation have a website?</p> <p>13 A. Yes.</p> <p>14 Q. And as the president, is it your responsibility 15 what's on that website?</p> <p>16 A. It is primarily our vice president who handles 17 the website.</p> <p>18 Q. And that is who?</p> <p>19 A. Avi Eindorot.</p> <p>20 Q. But even though the vice president handles it, 21 would you agree that as the president you are ultimately 22 responsible for everything that is on the website?</p> <p>23 A. I advise him about it.</p> <p>24 Q. And you review it and approve it?</p> <p>25 A. There is not really a formal approval process,</p>	<p style="text-align: right;">Page 72</p> <p>1 A. (Complying.)</p> <p>2 Q. Thank you. There you go. Exhibit 2, you have 3 reviewed it?</p> <p>4 A. I pretty much know what's on it.</p> <p>5 Q. All right. In the bio for William Armstrong 6 Percy Foundation, III --</p> <p>7 A. Uh-huh.</p> <p>8 Q. -- after it talks about his educational 9 achievements, and I am reading here it says, sexually 10 active since the age of 5. William A. Percy was 11 sexually active at the age of 5?</p> <p>12 A. That's what he has told me. I mean, he boasts 13 to people about it.</p> <p>14 Q. And why do you as the executive director of the 15 William A. Percy Foundation feel a need to advertise 16 that on the website introducing acquiring minds to the 17 foundation?</p> <p>18 A. It is something he says about himself. It was 19 other boys of his own age that he experimented with, and 20 he says it is part of the reason that he has always, you 21 know, had a healthy sexual appetite, which he has had 22 into his 80s.</p> <p>23 Q. So the founder and namesake of the William 24 Arm -- William A. Percy Foundation of which you are the 25 president touts that his healthy sexual appetite is due</p>
<p style="text-align: right;">Page 71</p> <p>1 but he consults me at least so there are no conflicts.</p> <p>2 Q. And have you -- have you reviewed what's on 3 your website?</p> <p>4 A. I believe at least once I probably read 5 everything that's there.</p> <p>6 Q. But you believe it was drafted by Avi?</p> <p>7 A. Well, some of the things were written by me, 8 some were written by a number of other people. I mean, 9 we sort have guest editorials that people can send us, 10 and, you know, if we think it is reasonable and 11 interesting we will publish it.</p> <p>12 Q. Is the purpose of the website so acquaint 13 inquiring minds with what the William A. Percy 14 Foundation is and what it does?</p> <p>15 A. Yes.</p> <p>16 Q. I am going to show you something from your 17 website and ask you if you have seen it before. You 18 know that your bio -- your bio is on the website, right?</p> <p>19 A. Oh, yes. I certainly approved of that.</p> <p>20 Q. Yeah, you better approve that.</p> <p>21 (Exhibit 2 marked.)</p> <p>22 Q. (BY MR. PRINGLE JR.) Exhibit 2 is going to be 23 an exert from that website. I just want you to look it 24 over. Professor, can I have that back so I can stick a 25 sticker on and otherwise I will lose it.</p>	<p style="text-align: right;">Page 73</p> <p>1 to the fact that he was sexually active at the age of 5?</p> <p>2 A. Well, he is not the founder, I am the founder.</p> <p>3 Q. He is the namesake?</p> <p>4 A. Yes, one of the two. And, yes, I mean, he 5 likes boasting about himself. He has also boasted that 6 he has had 30,000 sexual partners during his life.</p> <p>7 Q. Beginning at the age of 5?</p> <p>8 A. Yes.</p> <p>9 Q. Do you know whether William Armstrong Percy was 10 ever sexually molested by an adult?</p> <p>11 A. He would not call it molestation, but he has 12 told me that as an adolescent he actively seduced 13 adults, that he was very attracted to soldiers. This 14 would have been back in the aftermath of World War II. 15 And when he was traveling from his home in Memphis to 16 his preschool in the northeast he would frequently see 17 soldiers on the train and proposition them.</p> <p>18 Q. So can we agree that an adult who has sex with 19 a 5 year old is by definition a pedophile?</p> <p>20 A. Yes.</p> <p>21 Q. All right. In the introductory materials to 22 the foundation of which you are the president and which 23 Mr. Percy is one of the namesakes, do you ever 24 distinguish that the namesake's sexual activity at the 25 age of 5 was not with adult men?</p>

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74 to 77

<p style="text-align: right;">Page 74</p> <p>1 A. No, we did not say that.</p> <p>2 Q. Okay.</p> <p>3 A. But that is my understanding, is it was with</p> <p>4 other boys in the neighborhood.</p> <p>5 Q. Okay. Do you think that somebody reviewing</p> <p>6 this could come to the collusion that this endorses</p> <p>7 sexual activity at the age of 5?</p> <p>8 MR. SIBLEY: Objection. Form.</p> <p>9 A. No.</p> <p>10 Q. (BY MR. PRINGLE JR.) Certainly doesn't condemn</p> <p>11 it, does it?</p> <p>12 A. No.</p> <p>13 Q. Just nonjudgmental one way or the other?</p> <p>14 A. It is nonjudgmental about 5 year old</p> <p>15 experimenting with 5 year old.</p> <p>16 Q. But that's what it says, does it?</p> <p>17 A. It happens much more often than you might</p> <p>18 think.</p> <p>19 Q. But it doesn't says that Dr. Percy was sexually</p> <p>20 active with other 5 year old, it just says that he was</p> <p>21 sexual active since the age of five?</p> <p>22 A. Yes. We did not want to make the biographies</p> <p>23 overly long or filled with unnecessary detail.</p> <p>24 Q. How do you think a pedophile would read that</p> <p>25 phrase, sexually active since the age of 5?</p>	<p style="text-align: right;">Page 76</p> <p>1 MR. SIBLEY: Objection. Form.</p> <p>2 A. As long as his activity was consensual and with</p> <p>3 other kids his own age who also consented, I do not</p> <p>4 think that is immoral.</p> <p>5 Q. But none of those qualifiers are in the bio,</p> <p>6 are they?</p> <p>7 A. Perhaps we should have put them there.</p> <p>8 Q. Why? So that nobody might get the impression</p> <p>9 that you endorse sex with minors, sex with children?</p> <p>10 MR. SIBLEY: Objection. Form.</p> <p>11 A. We might make that clearer if we added those</p> <p>12 details, and I will talk with our webmaster and</p> <p>13 appreciate your suggestion that we ought to.</p> <p>14 (BY MR. PRINGLE JR.) Okay. So you can</p> <p>15 appreciate the suggestion that one might come to the</p> <p>16 conclusion that it is a pro-pedophile organization --</p> <p>17 MR. SIBLEY: Objection. Form.</p> <p>18 (BY MR. PRINGLE JR.) -- absent that</p> <p>19 clarification you are going to make?</p> <p>20 MR. SIBLEY: Objection. Form.</p> <p>21 A. I believe anyone looking at our website would</p> <p>22 review the rest of the contents of the website and</p> <p>23 realize our agenda is rather different from that and is</p> <p>24 not even focused specifically on the age of contest,</p> <p>25 although it is one of a range of issues that we look --</p>
<p style="text-align: right;">Page 75</p> <p>1 MR. SIBLEY: Objection. Form.</p> <p>2 A. Well, you are asking me to speculate.</p> <p>3 Q. (BY MR. PRINGLE JR.) I am. How do you think a</p> <p>4 pedophile would read that?</p> <p>5 A. As confirming Sigmund Freud's doctrine that we</p> <p>6 have all have sexual instincts from a very young age. I</p> <p>7 mean, this is a common place in the history of</p> <p>8 psychologist, not just Freud, Melanie Klein, you know,</p> <p>9 who is a Freud and disciple who specialized in</p> <p>10 developmental psychology, have all acknowledged that</p> <p>11 even at that young age kids enjoy playing with their</p> <p>12 private parts.</p> <p>13 Q. And at that age, do kids enjoy playing with</p> <p>14 adult's private parts?</p> <p>15 MR. SIBLEY: Objection. Form.</p> <p>16 A. Some of them might. I don't know. I mean, I</p> <p>17 never had any experience with that. I mean, I was not</p> <p>18 sexually active until I was an adult.</p> <p>19 (BY MR. PRINGLE JR.) But to you it is not</p> <p>20 jarring at all that the bio for the namesake of the</p> <p>21 William A. Percy Foundation touts the fact that the</p> <p>22 namesake was sexually active at the age of 5?</p> <p>23 MR. SIBLEY: Objection. Form.</p> <p>24 (BY MR. PRINGLE JR.) You are not troubled at</p> <p>25 all by that, are you?</p>	<p style="text-align: right;">Page 77</p> <p>1 that we sponsor research on.</p> <p>2 (BY MR. PRINGLE JR.) That's assuming that the</p> <p>3 inquiring mind visiting your website and wondering who</p> <p>4 you are gets past the fact that the namesake is proudly</p> <p>5 proclaiming his sexual emancipation at the age of 5?</p> <p>6 MR. SIBLEY: Objection. Form.</p> <p>7 A. As I answered in response to the previous</p> <p>8 question, I believe they are going to read more than</p> <p>9 that.</p> <p>10 (BY MR. PRINGLE JR.) And you do condemn</p> <p>11 pedophilia, don't you? You do condemn pedophilia?</p> <p>12 A. Oh, yes, absolutely.</p> <p>13 Q. You condemn pederasty?</p> <p>14 A. It depends upon the cultural context. I think</p> <p>15 it is wrong to do it in a jurisdiction where it is</p> <p>16 against the law, and I condemn any violation of the law</p> <p>17 unless it is an explicit act of civil disobedience to</p> <p>18 test the law through the judicial system, such as</p> <p>19 happened in the desegregation struggles of the early</p> <p>20 60s.</p> <p>21 Q. Understood. Do you condemn pederasty in the</p> <p>22 modern world?</p> <p>23 MR. SIBLEY: Objection. Form.</p> <p>24 A. In those jurisdictions where it is illegal.</p> <p>25 (BY MR. PRINGLE JR.) All right.</p>

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78 to 81

<p style="text-align: right;">Page 78</p> <p>1 A. Which is -- well, depending on the age, I mean, 2 some states like California where I live have an 3 absolute age of contest of 18 with the age gap 4 expectation, so I think people in California should not 5 do it.</p> <p>6 Q. Do you think pederasty today is immoral?</p> <p>7 A. I believe any violation of the law is unless it 8 is specifically, as I mentioned, civil disobedience with 9 the express purpose of testing a law in court.</p> <p>10 Q. Now, my question is not whether it is legal. 11 My question is whether you believe it is immoral.</p> <p>12 MR. SIBLEY: Objection. Form.</p> <p>13 Q. (BY MR. PRINGLE JR.) You understand the 14 distinguish between --</p> <p>15 A. Only with that proviso.</p> <p>16 Q. You understand the distinction between illegal 17 and immoral?</p> <p>18 MR. SIBLEY: Objection. Form.</p> <p>19 A. Yes, I do.</p> <p>20 Q. (BY MR. PRINGLE JR.) What is it?</p> <p>21 A. Illegal is anything that is in violation of the 22 laws. Moral is contingent upon the perceiving subjects 23 sins of morality.</p> <p>24 Q. All right. With that understanding, do you 25 believe that pederasty, under your sense of morals, is</p>	<p style="text-align: right;">Page 80</p> <p>1 mentioned that have lower ages of contest, there are 2 also provisions of the law that illegalize or render 3 unlawful those kinds of relationships.</p> <p>4 Q. And why should pederasty be punished severely 5 in those contingencies that you just mentioned?</p> <p>6 MR. SIBLEY: Objection. Form.</p> <p>7 A. Because there is a possibility -- an enhanced 8 likelihood that the relationship might involve 9 manipulation or some kind of special award that would 10 not constitute a complete exercise of freewill on the 11 part of the younger partner.</p> <p>12 Q. (BY MR. PRINGLE JR.) You would agree then that 13 any sexual relations between an adult male and, say, a 14 14-year-old boy that had any aspect of corrosion, 15 promise of an award, financial award, any sort of 16 corrosion at all is immoral?</p> <p>17 MR. SIBLEY: Objection. Form.</p> <p>18 A. Yes.</p> <p>19 Q. (BY MR. PRINGLE JR.) Okay. And how do we know 20 whether that has occurred?</p> <p>21 A. It would be based upon the young person's 22 testimony.</p> <p>23 Q. What about the -- what about the adult? How 24 does he know whether pederasty is immoral or not?</p> <p>25 A. Adults have an obligation to be informed of the</p>
<p style="text-align: right;">Page 79</p> <p>1 immoral?</p> <p>2 A. It is not immoral in Germany or Italy or 3 Austria or a number of other European and advanced Asian 4 countries because it is not against the law there. I do 5 believe it is immoral in California and Florida where 6 all sexual activity under the age of 18 is against the 7 law. And I -- because I do not think that anyone can 8 justify violating those laws as an act of civil 9 disobedience.</p> <p>10 Q. You are telling me where you think it is 11 illegal. I want to know where you think it is immoral.</p> <p>12 MR. SIBLEY: Objection. Form.</p> <p>13 Q. (BY MR. PRINGLE JR.) Is your --</p> <p>14 A. In jurisdictions where it is illegal.</p> <p>15 Q. Okay. And wherever else it is okay? It 16 doesn't violate any sense of morality that you might 17 have?</p> <p>18 A. Well, again, it is contingent on all kinds of 19 if clauses. If it involves someone in a supervisory 20 position over a minor, like a teacher or a therapist or 21 a medical doctor or, you know, a court-appointed 22 guardian, that would certainly be very immoral and 23 should be punished by the criminal law.</p> <p>24 Q. (BY MR. PRINGLE JR.) And --</p> <p>25 A. And in most of the jurisdictions that I've</p>	<p style="text-align: right;">Page 81</p> <p>1 laws in the jurisdiction of their residence, and I think 2 on a basic moral level, they have an obligation to 3 ensure informed consent, not just contest, but informed 4 contest.</p> <p>5 Q. And you understand a child under the age of 6 consent cannot give consent?</p> <p>7 MR. SIBLEY: Objection. Form.</p> <p>8 A. In a purely legal sense.</p> <p>9 Q. (BY MR. PRINGLE JR.) Right?</p> <p>10 A. But I believe that's a legal fiction.</p> <p>11 Q. Say that again.</p> <p>12 A. I believe that the age of consent is a legal 13 fiction because it depends upon the individual and the 14 circumstances, and these vary greatly from circumstances 15 that are violent rape, such as the Defendant has accused 16 me of advocating. And I don't advocate at all, I 17 condemn that absolutely. It depends on whether there is 18 a relationship of supervision or power between the two. 19 It depends upon whether there is explicit verbal consent 20 on the part of both parties.</p> <p>21 Q. So your position then is pederasty is not 22 immoral if it occurs between a minor who consents to 23 have sex with the adult?</p> <p>24 A. As long --</p> <p>25 MR. SIBLEY: Objection. Form.</p>

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82 to 85

<p style="text-align: right;">Page 82</p> <p>1 A. As long as it is legal in the jurisdiction. 2 Q. And if there is any sort of supervisory 3 relationship between the adult and the child, you would 4 condemn it? 5 A. Yes. 6 Q. Because you would agree that the adult has 7 influence and advantages over the child due to years of 8 experience, advanced economic position, things like 9 that?</p> <p>10 A. I think the more important kind of influence 11 would be the influence that a medical provider has in 12 terms of, you know, recommending various actions with 13 respect to the child or the influence they might have in 14 doing an inappropriate examination of the young person, 15 such as has happened in all of these scandals involving 16 athletic coaches or teen doctors. I mean, I absolutely 17 condemn that kind of thing, and I think relationships 18 between teachers and students under their supervision 19 are wrong.</p> <p>20 Q. So let's say we have age of consent is 14. 21 A. Uh-huh. 22 Q. And a 23-year-old man hooks up with a boy on -- 23 what was the site you talked about earlier? 24 A. Seeking Arrangement. 25 Q. Seeking Arrangement?</p>	<p style="text-align: right;">Page 84</p> <p>1 Q. I am not asking about child prostitution, 2 though? 3 A. But just giving gifts? 4 Q. Yeah. I am asking about giving gifts, wooing 5 them, courting the 14 year old with, I guess, theater 6 tickets, sports tickets, maybe a new baseball glove, 7 things of nature, but you are okay with that as long as 8 the child is above the hypothetical age of -- 9 A. But the ancient -- 10 MR. SIBLEY: Objection. Form. 11 A. The ancient Greeks were okay with that. They 12 frequently show on the Vase painting gift-giving. 13 Q. (BY MR. PRINGLE JR.) But I am not asking about 14 the ancient Greeks, I am asking about now. I am asking 15 you what you think about now. You think that's okay? 16 MR. SIBLEY: Objection. Form. 17 A. Depends on the nature of the gifts. If it is 18 something, you know, very minor, it -- 19 Q. (BY MR. PRINGLE JR.) How about my examples? 20 A. -- is something that is incidental. Well, like 21 a baseball glove. 22 Q. And theater tickets and basketball tickets. 23 A. If it's a quid pro quo where I am going to give 24 you this baseball glove if you let me have oral sex with 25 you, I think that would be objectionable and immoral.</p>
<p style="text-align: right;">Page 83</p> <p>1 A. But anyone has to be 18 to register for that 2 site. 3 Q. Or at least represent that they are 18, right? 4 A. Yeah, pretend to be 18. 5 Q. All right. 6 A. And, yes, it does happen that younger kids will 7 go on saying they are 18 and an adult unwilling gets 8 involved with that. 9 Q. Work with me on this thought experiment, 10 though. 25-year-old man meets up with a kid on one of 11 those sites, say, 14-year-old kid, woos the child with 12 gifts, maybe theater tickets, sports tickets, things of 13 that nature if the child agrees to have sex with that 14 adult. Nothing wrong with that in your mind, is there? 15 MR. SIBLEY: Objection. Form. 16 A. If the adult knows that the younger person is 17 younger than the age of consent in their jurisdiction, I 18 think that would be wrong and should be punished. 19 Q. (BY MR. PRINGLE JR.) But if he is only -- but 20 he is 14 and at the age of consent, you are okay with 21 that? 22 MR. SIBLEY: Objection. Form. 23 A. A lot is contingent on the context, child 24 prostitution below the 18 is illegal in almost every 25 jurisdiction.</p>	<p style="text-align: right;">Page 85</p> <p>1 But if it is part of an ongoing relationship that 2 started quite separate from the gifts, that would be 3 different. 4 Q. (BY MR. PRINGLE JR.) And you would be okay 5 with that? 6 A. In the jurisdictions where it is legal. 7 Q. Okay. And you would be okay with the -- our 8 hypothetical 25-year-old man and 14-year-old boy with 9 the hypo -- or adult showering the boy with gifts until 10 he consents to sex? 11 MR. SIBLEY: Objection. Form. 12 Q. (BY MR. PRINGLE JR.) Again, expectation or 13 quid pro quo. 14 MR. SIBLEY: Objection. Form. 15 A. I think what you described is a quid pro quo. 16 Q. (BY MR. PRINGLE JR.) How? 17 A. If he has made it clear that continuing to give 18 gifts is going to be contingent upon granting sexual 19 favors, I think that's wrong. 20 Q. (BY MR. PRINGLE JR.) Well, I am not saying 21 there is any sort of understanding in that regard, just 22 continuing to give gifts. You okay with that? 23 MR. SIBLEY: Objection. Form. 24 A. And they are not yet having sex? I think -- 25 there is nothing wrong with giving young people gifts as</p>

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<p style="text-align: right;">Page 86</p> <p>1 long as there is no force corrosion or manipulation to 2 do something for those gifts.</p> <p>3 Q. (BY MR. PRINGLE JR.) As long as the 14 year 4 old is exercising informed consent, correct?</p> <p>5 A. Yes. Yes.</p> <p>6 Q. Okay. Let's talk about when you first met 7 Ms. Blakemore?</p> <p>8 A. Was when she was handing out her flyers to my 9 class. Otherwise, this was a large class with over 120 10 students in it, and she had never come to see me or ask 11 me anything.</p> <p>12 Q. And at the time Ms. Blakemore handed out the 13 flyers, was she still a member of your class?</p> <p>14 A. No. She said she had dropped it.</p> <p>15 Q. Did she say why she dropped it?</p> <p>16 A. I don't believe she gave a specific reason. 17 She just said -- I believe that I'd asked her what grade 18 she was getting in the class, and she said, I dropped 19 your class.</p> <p>20 Q. You asked her what grade she was getting?</p> <p>21 A. Yes.</p> <p>22 Q. When?</p> <p>23 A. When she was handing out her flyer.</p> <p>24 Q. Why?</p> <p>25 A. Because I find that often if students are</p>	<p style="text-align: right;">Page 88</p> <p>1 media. But the people who have looked at it have told 2 me that she was an aspiring model, and, you know, showed 3 me a couple of photographs from her page, partly to make 4 sure that this was the same person that was in my class, 5 and it was.</p> <p>6 Q. But when she handed you the flyer, you didn't 7 know her from Adam, did you?</p> <p>8 A. No.</p> <p>9 Q. And at that time she was no longer a student in 10 your class?</p> <p>11 A. That's what she said.</p> <p>12 Q. And that's what you confirmed?</p> <p>13 A. Her last grade in the class was on the 14 mid-term, which was around October 15th.</p> <p>15 Q. And did she drop your class?</p> <p>16 A. That's what she said and, yes, I think she had 17 have a Q drop on the --</p> <p>18 Q. A what drop?</p> <p>19 A. A Q drop.</p> <p>20 Q. What's that?</p> <p>21 A. It means quit. Q for quit.</p> <p>22 Q. Oh. And what do you have to do to get a Q 23 drop?</p> <p>24 A. There is a petition that you file with your 25 college, and they are almost always approved. The</p>
<p style="text-align: right;">Page 87</p> <p>1 really angry at a professor it is because of some kind 2 of objection to their grade or the class being too hard. 3 And I am a very tough grader, and I assign a lot of 4 work. It is one of the reasons that I am not the most 5 popular professor is there is a generalized atmosphere 6 of grade inflation at the University of Texas, and there 7 has been insufficient administrative attention to that 8 issue. My standards are essentially the same as what my 9 professor's standards were when I was a student over 40 10 years ago because I believe students deserve to get the 11 same quality of education I benefited from.</p> <p>12 Q. Do you know anything about Ms. Blakemore other 13 than from your interaction with her and her being a 14 student in your class? For example, do you know 15 anything about her politics?</p> <p>16 A. Yes. One of my teaching assistants looked her 17 up and told me that she was the daughter of this 18 prominent Republican political activist. I believe 19 someone else looked at her Facebook page, which at the 20 time stated that she was interested in Republican 21 politics.</p> <p>22 Q. Other than that, do you have any knowledge of 23 her?</p> <p>24 A. Again, it is -- I have not looked at her 25 Facebook page. I don't use Facebook or any social</p>	<p style="text-align: right;">Page 89</p> <p>1 University has grown very lax about letting students do 2 that really up until the final exam.</p> <p>3 Q. So what was the reason that she gave for the Q 4 drop?</p> <p>5 A. She didn't explain her reason to me me.</p> <p>6 Q. So you have no idea why she dropped your class.</p> <p>7 A. No. Although, my speculation is because she 8 wasn't doing well.</p> <p>9 Q. Purely speculation, though?</p> <p>10 MR. SIBLEY: Objection. Form.</p> <p>11 A. Well, I think getting a 48 on the mid-term is a 12 sign of not doing well, and that is often -- in fact, in 13 most instances, the reason that people drop classes is 14 to avoid getting a bad grade on their transcript and 15 lower their GPA.</p> <p>16 Q. (BY MR. PRINGLE JR.) But you are guessing why 17 she drop the class, aren't you? You don't know?</p> <p>18 MR. SIBLEY: Objection. Form.</p> <p>19 A. It is an educated guess, yes.</p> <p>20 Q. (BY MR. PRINGLE JR.) Is it an educated guess 21 only because you're an educated guy?</p> <p>22 MR. SIBLEY: Objection. Form.</p> <p>23 Q. (BY MR. PRINGLE JR.) What did you do to 24 educate yourself as that's the reason she dropped it?</p> <p>25 MR. SIBLEY: Objection. Form.</p>

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<p style="text-align: right;">Page 90</p> <p>1 A. I have 40 years of experience as a teacher. I 2 have seen many students drop my classes. It is almost 3 always because they are not doing well.</p> <p>4 Q. (BY MR. PRINGLE JR.) But you don't know with 5 respect to her, do you?</p> <p>6 A. Not with 100 percent certainty.</p> <p>7 Q. You don't know to any certainty, do you?</p> <p>8 MR. SIBLEY: Objection. Form.</p> <p>9 A. It is an educated guess based upon 10 probabilities based on my previous experience with 11 students who take Q drops.</p> <p>12 Q. (BY MR. PRINGLE JR.) And so what did you do to 13 educate yourself on that guess?</p> <p>14 A. Again, it is based upon 40 years of teaching. 15 I mean, 32 years -- no, 33 years of teaching at U.T.</p> <p>16 Q. So I am guessing nothing?</p> <p>17 MR. SIBLEY: Objection. Form.</p> <p>18 A. It is not something I really needed to educate 19 myself on. I just knew it from experience that almost 20 every student who has taken a Q drop late in the 21 semester -- now, of course early in the semester they 22 often drop classes just because they are shopping 23 around, but if someone drops the class halfway through 24 the semester, in almost every case I am familiar with, 25 it is because they were doing poorly.</p>	<p style="text-align: right;">Page 92</p> <p>1 students for safety.</p> <p>2 Q. Anybody else you've talked about Sarah other 3 than Avi and some of your -- the people that you just 4 mentioned?</p> <p>5 A. And my attorneys.</p> <p>6 Q. And your attorneys, yeah.</p> <p>7 A. Well, my teaching assistant.</p> <p>8 Q. Anderson?</p> <p>9 A. No, Zaramian. I mean, he is the one who found 10 out that she was a daughter of a prominent political 11 strategist or operative who was connected with the 12 lieutenant governor.</p> <p>13 Q. Yeah, but that's not her, that's her dad, 14 right?</p> <p>15 A. Yes. But it gives you a sense of her 16 upbringing, and often at a young age students are very 17 influenced in their politics by what their family's 18 politics were.</p> <p>19 Q. Well, we know that your father was an abusive 20 alcoholic, right?</p> <p>21 A. No, no, that was my grandfather.</p> <p>22 Q. Oh, okay.</p> <p>23 A. My mother's father.</p> <p>24 Q. And your father was?</p> <p>25 A. He was a very -- he was an accountant, a very</p>
<p style="text-align: right;">Page 91</p> <p>1 Q. (BY MR. PRINGLE JR.) Have you ever had any 2 discussions with people other than your lawyers about 3 Sarah?</p> <p>4 A. With a few people whom we've named in the 5 interrogatories.</p> <p>6 Q. And tell me who those people are?</p> <p>7 A. Well, I have Avi Eindorot was one of them 8 because he was a journalist and did some research on 9 her.</p> <p>10 Q. All right.</p> <p>11 A. He is the one that visited her Facebook page, 12 and, you know, saw what her affiliations of interests 13 were. Who else? They were various people who have 14 heard about the attack on my house and who contacted me 15 because they were concerned about me. And I may have 16 mentioned that she was the one who started it.</p> <p>17 Q. You told people that Sarah Blakemore started 18 the attack on your house?</p> <p>19 A. No, that she started the false rumors that led 20 to that attack, and we know now from evidence that we 21 have seen in discovery that she was in direct contact 22 with the group that did it, and that they only learned 23 about me from her --</p> <p>24 Q. What evidence do you have --</p> <p>25 A. -- and her colleagues in her small group</p>	<p style="text-align: right;">Page 93</p> <p>1 moral man who, you know, once told me that the controls 2 in his company were so lax that if he wanted to embezzle 3 money that he easily could and not be detected. But he 4 never did, and the owner of the company absolutely 5 trusted him. My father was a military officer who 6 served during both War World II and the Korea era, and a 7 man of very strict and conservative morality.</p> <p>8 Q. So we can discern your politics from your 9 father's?</p> <p>10 MR. SIBLEY: Objection. Form.</p> <p>11 A. I would say we are both to the right 12 politically. Although my father would have been more of 13 a traditional conservative, and I am more of a 14 libertarian.</p> <p>15 Q. (BY MR. PRINGLE JR.) Have you ever met any 16 member of Sarah's family?</p> <p>17 A. No.</p> <p>18 Q. Have you ever talked to any of them?</p> <p>19 A. No.</p> <p>20 Q. What do you -- is everything that you know 21 about Sarah and her family based on what others have 22 told you from review of social media?</p> <p>23 A. Also based upon some of the communications with 24 her family that we've seen through discovery.</p> <p>25 Q. All right. And how about Holly Green? Have</p>

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<p style="text-align: right;">Page 94</p> <p>1 you had any interaction with Holly Green?</p> <p>2 A. Never met her.</p> <p>3 Q. All right. And Zoey Thomas?</p> <p>4 A. I have never met her.</p> <p>5 Q. Never spoken to her before this?</p> <p>6 A. No. I mean, we've probably been at lectures 7 and department meetings together because she is a 8 graduate student in my department, but, no, she has 9 never had a conversation with me, sent me an e-mail, or 10 anything, or inquire what my actual views on these 11 questions were. None of them ever contacted me to 12 express their concerns with me or, you know, find out 13 why I published the things I did.</p> <p>14 THE COURT REPORTER: Can we go off the 15 record really quickly?</p> <p>16 THE VIDEOGRAPHER: Off the record the 17 12:34.</p> <p>18 (Recess taken.)</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 96</p> <p>1 I, THOMAS HUBBARD, have read the foregoing 2 transcript and hereby affix my signature that same is 3 true and correct, except as noted above.</p> <p>4</p> <p>5</p> <p>6 -----</p> <p>7</p> <p>8 THE STATE OF TEXAS)</p> <p>9 COUNTY OF _____)</p> <p>10 Before me, _____, on 11 this day personally appeared THOMAS HUBBARD, known to me 12 (or proved to me under oath or through 13 _____) (description of identity card 14 or other document) to be the person whose name is 15 subscribed to the foregoing instrument and acknowledged 16 to me that they executed the same for the purposes and 17 consideration therein expressed.</p> <p>18 Given under my hand and seal of office 19 this _____ day of _____, 2021.</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p style="text-align: right;">NOTARY PUBLIC IN AND FOR THE STATE OF TEXAS</p> <p>25</p>																																																																								
<p style="text-align: right;">Page 95</p> <p>1 CHANGES AND SIGNATURE PAGE</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left; padding-bottom: 2px;">2 PAGE/LINE</th> <th style="text-align: left; padding-bottom: 2px;">CHANGE</th> <th style="text-align: left; padding-bottom: 2px;">REASON</th> </tr> </thead> <tbody> <tr><td>3 -----</td><td></td><td></td></tr> <tr><td>4 -----</td><td></td><td></td></tr> <tr><td>5 -----</td><td></td><td></td></tr> <tr><td>6 -----</td><td></td><td></td></tr> <tr><td>7 -----</td><td></td><td></td></tr> <tr><td>8 -----</td><td></td><td></td></tr> <tr><td>9 -----</td><td></td><td></td></tr> <tr><td>10 -----</td><td></td><td></td></tr> <tr><td>11 -----</td><td></td><td></td></tr> <tr><td>12 -----</td><td></td><td></td></tr> <tr><td>13 -----</td><td></td><td></td></tr> <tr><td>14 -----</td><td></td><td></td></tr> <tr><td>15 -----</td><td></td><td></td></tr> <tr><td>16 -----</td><td></td><td></td></tr> <tr><td>17 -----</td><td></td><td></td></tr> <tr><td>18 -----</td><td></td><td></td></tr> <tr><td>19 -----</td><td></td><td></td></tr> <tr><td>20 -----</td><td></td><td></td></tr> <tr><td>21 -----</td><td></td><td></td></tr> <tr><td>22 -----</td><td></td><td></td></tr> <tr><td>23 -----</td><td></td><td></td></tr> <tr><td>24 -----</td><td></td><td></td></tr> <tr><td>25 -----</td><td></td><td></td></tr> </tbody> </table>	2 PAGE/LINE	CHANGE	REASON	3 -----			4 -----			5 -----			6 -----			7 -----			8 -----			9 -----			10 -----			11 -----			12 -----			13 -----			14 -----			15 -----			16 -----			17 -----			18 -----			19 -----			20 -----			21 -----			22 -----			23 -----			24 -----			25 -----			<p style="text-align: right;">Page 97</p> <p>1 UNITED STATES DISTRICT COURT FOR THE 2 WESTERN DISTRICT OF TEXAS 3 AUSTIN DIVISION</p> <p>4 DR. THOMAS HUBBARD, PhD.,) 5 Plaintiff,) 6 VS.) CA NO. 1:20-CV-00767-R 7 SARAH ALLEN BLAKEMORE;) 8 AND JOHN DOES 1-10,) 9 Defendants.)</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
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1 I further certify that I am neither attorney
2 nor counsel for, related to, nor employed by any of the
3 parties to the action in which this testimony was taken.

4 Further, I am not a relative or employee of
5 any attorney of record in this cause, nor do I have a
6 financial interest in the action.

7 Subscribed and sworn to on this 9th day of
8 June, 2021.

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13 JAZZMEN C. CANALES, Texas CSR #9344

14 Expiration Date: 04/30/2023

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1 UNITED STATES DISTRICT COURT FOR THE
2 WESTERN DISTRICT OF TEXAS
3 AUSTIN DIVISION

4 DR. THOMAS HUBBARD, PhD.)
5 Plaintiff,)
6)
7 v.) CA NO. 1:20-cv-00767-RP
8)
9 SARAH ALLEN BLAKEMORE; and) JURY DEMANDED
10 JOHN DOES 1 - 10,)
11 Defendants)

12 *****
13 ORAL VIDEOTAPED DEPOSITION
14 THOMAS HUBBARD, Ph.D.
15 May 25, 2021
16 VOLUME 2
17 (Reported Remotely)
18 *****
19 *****
20 ORAL VIDEOTAPED DEPOSITION OF THOMAS HUBBARD, Ph.D.,
21 produced and appearing remotely (via Zoom) from the
22 offices of Wright & Greenhill, P.C.: 900 Congress
23 Avenue, Suite 500, Austin, Texas, 78701, as a witness at
24 the instance of the Defendant and duly sworn, was taken
25 in the above-styled and numbered cause, on May 25, 2021,
from 1:37 p.m. to 7:09 p.m., before Jennifer L.
Marquardt, Certified Shorthand Reporter in and for the
State of Texas, reported remotely by computerized
stenotype machine, pursuant to the Federal Rules of
Civil Procedure and in accordance with the current
Emergency Order Regarding the COVID-19 State of Disaster
and the provisions stated on the record or attached
hereto.

May 25, 2021

2 to 5

	APPEARANCES	Page 2	EXHIBITS (cont.)	PAGE	Page 4
	INDEX	PAGE	DESCRIPTION	PAGE	
1	FOR THE PLAINTIFF, THOMAS HUBBARD, Ph.D.:		1 EXHIBIT	13	August 16, 2009, letter to Randy Diehl from Thomas Hubbard
2	Joseph D. Sibley Camara & Sibley, L.L.P. 1108 Lavaca Street, Suite 110263 Austin, Texas 78701 Telephone: (713) 966-6789 Facsimile: (713) 583-1131 E-mail : Sibley@camarasibley.com		14		"Classics at the Intersections" 172
3	FOR THE DEFENDANT, SARAH BLAKEMORE:		15		"Response: Davidson on Verstraete on Davidson, The Greeks and Greek Love: A Radical Reappraisal of Homosexuality in Ancient Greece" 178
4	Brantley Ross Pringle, Jr. Hoover Slovacek, L.L.P. 5051 Westheimer, Suite 1200 Houston, Texas 77056 Telephone: (713) 977-8686 Facsimile: (713) 977-5395 E-mail : Rpringle@w-g.com		16	17	Liv Mariah Yarrow's blog 180 Introduction to a publication 181 of writings by sex offenders
5	ALSO PRESENT:		18		Copy of original EEOC complaint 195
6	Sarah Allen Blakemore U.S. Legal Support videographer		19		Series of e-mails 211
7			14		***Court Reporter's Note: Court reporter was never given possession of exhibits ***
8			15		
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	EXHIBITS	PAGE			Page 5
10	EXHIBIT	DESCRIPTION	PAGE		
11	3	Series of e-mails	23	1	THE VIDEOGRAPHER: We're back on the
12	4	Series of e-mails	24	2	record at 1:37.
13	5	"Pederasty and Democracy: The Marginalization of a Social Practice" by Thomas K. Hubbard	61	3	THE REPORTER: Okay. Okay. My name is
14	6	U.S. v. Mayer, 503 F.3d 740 (2007)	63	4	Jennifer Marquardt, CSR No. 7034. I'm administering the
15	7	"Sexual Consent and the Adolescent Male, or What We Can Learn from the Greeks"	96	5	oath and reporting the deposition remotely by
16	8	"Introduction to Special Issue on Boys' Sexuality and Age of Consent"	155	6	stenographic means from Houston, Texas, representing the
17	9	Unknown	159	7	office of U.S. Legal Support, located at 16825
18	10	Retraction letter	162	8	Northchase Drive, Suite 900, Houston, Texas 77060. This
19	11	Thomas Hubbard's response to rumors on social media	164	9	is the oral deposition of Thomas Hubbard.
20	12	Series of e-mails	165	10	THOMAS HUBBARD, Ph.D.,
21				11	having been first duly sworn, testified as follows:
22				12	EXAMINATION
23				13	Q. (BY MR. PRINGLE, JR.) All right. Dr. Hubbard,
24				14	we're ready to go -- keep going?
25				15	A. Uh-huh.
				16	Q. Okay. We were talking, before we left, about
				17	the -- about the -- the day of the handing out of the
				18	flyer in the classroom.
				19	A. Uh-huh.
				20	Q. Was that the first indication of any event that
				21	gives rise to the lawsuit that you brought? First
				22	indication that you had?
				23	A. Yes.
				24	Q. And do you remember the date that -- that that
				25	happened with the flyer being handed out?

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6 to 9

<p style="text-align: right;">Page 6</p> <p>1 A. I believe it was November 21st of 2019.</p> <p>2 Q. The date of the flyer itself?</p> <p>3 A. Yes.</p> <p>4 Q. And at that time, you were teaching the</p> <p>5 mythologies of -- excuse me --</p> <p>6 A. Classical Mythology.</p> <p>7 Q. Classical Mythology.</p> <p>8 And that was -- where was that class held?</p> <p>9 A. Flawn Academic Center 21.</p> <p>10 THE REPORTER: Could -- I'm sorry, could</p> <p>11 you repeat that, please?</p> <p>12 A. Flawn Academic Center, Room 21. That's Flawn,</p> <p>13 spelled F-L-A-W-N.</p> <p>14 MR. PRINGLE, JR.: Do you need to be</p> <p>15 closer?</p> <p>16 THE REPORTER: I'm hearing him fine. It</p> <p>17 was just very low, so . . .</p> <p>18 MR. PRINGLE, JR.: Okay.</p> <p>19 Q. (BY MR. PRINGLE, JR.) And what time of day was</p> <p>20 the class offered?</p> <p>21 A. I -- it was morning. I believe it was around</p> <p>22 11:00.</p> <p>23 Q. And describe what you saw or what happened to</p> <p>24 you that day when you got to class.</p> <p>25 A. Well, I got to class only a couple of minutes</p>	<p style="text-align: right;">Page 8</p> <p>1 A. She said, "You can go ahead and sue me, I don't</p> <p>2 care."</p> <p>3 Q. All right. Anything else that she said in</p> <p>4 response?</p> <p>5 A. That's all I remember in response to that --</p> <p>6 well, that statement of mine.</p> <p>7 Q. All right. And -- and then what happened?</p> <p>8 Kind of walk me through the interaction.</p> <p>9 A. As I said, I asked her about her grade. Based</p> <p>10 on my experience of 40-odd years of teaching, that most</p> <p>11 students who are unhappy with me are unhappy because</p> <p>12 they're not getting a good grade. And I'm a rather</p> <p>13 unusually tough grader and assign people heavy workloads</p> <p>14 for reasons, I think, I've already explained, because I</p> <p>15 think easy As and light workloads result in less</p> <p>16 educational benefit.</p> <p>17 Q. All right. You asked her what grade she -- she</p> <p>18 had or was making?</p> <p>19 A. Uh-huh.</p> <p>20 Q. Yes?</p> <p>21 A. Yes.</p> <p>22 Q. And what was her response?</p> <p>23 A. She never responded to that directly, but she</p> <p>24 said, "I dropped you."</p> <p>25 Q. Okay. And then what happened?</p>
<p style="text-align: right;">Page 7</p> <p>1 before it began, and what I saw was the defendant and</p> <p>2 one other young woman, whom I did not recognize, with</p> <p>3 posters and maybe even balloons handing out these</p> <p>4 flyers. And the defendant handed me one and announced</p> <p>5 who she was.</p> <p>6 Q. Were the -- were these two women, were they --</p> <p>7 were they at the door of your classroom?</p> <p>8 A. Yes, right in front of the double doors.</p> <p>9 Q. And are these the main doors into the</p> <p>10 classroom?</p> <p>11 A. Yes, the only doors.</p> <p>12 Q. All right. And I assume that they'd be the</p> <p>13 door that you would enter as well?</p> <p>14 A. Yes.</p> <p>15 Q. All right. And she handed you the flyer. Did</p> <p>16 you -- did you say anything to her?</p> <p>17 A. Yes. The -- the first thing I -- well, I read</p> <p>18 it, and the first thing I said is "This is libelous."</p> <p>19 Q. What else did you say?</p> <p>20 A. After she responded to that, I then asked</p> <p>21 her -- and told me that she had dropped the course -- or</p> <p>22 no. I -- I then asked her what grade she was getting,</p> <p>23 and then she said she had dropped the course.</p> <p>24 Q. So, when you said, "This is libelous" or words</p> <p>25 to that effect, what was her response?</p>	<p style="text-align: right;">Page 9</p> <p>1 A. I don't -- I -- I don't really remember any</p> <p>2 intersection with her after that. I just went into the</p> <p>3 room after.</p> <p>4 Q. So, have we talked about your discussions with</p> <p>5 her at the door of your classroom when she handed you</p> <p>6 the flyer?</p> <p>7 A. Yes.</p> <p>8 Q. Are there any other details you recall?</p> <p>9 A. Not that I recall.</p> <p>10 Q. Did you have any discussions with the other</p> <p>11 woman who was handing out a flyer?</p> <p>12 A. No.</p> <p>13 Q. Do you know who that is?</p> <p>14 A. No.</p> <p>15 Q. As we sit here today, do you know that is?</p> <p>16 A. No.</p> <p>17 Q. Did anybody witness your exchange with --</p> <p>18 A. No.</p> <p>19 Q. -- Miss Blakemore?</p> <p>20 A. No. There might've been another student or two</p> <p>21 who came into the auditorium during that, but I don't</p> <p>22 remember. I was really focused on her, because I was</p> <p>23 quite shocked at what she was doing there.</p> <p>24 Q. All right. So, then you went in. Then what</p> <p>25 happened?</p>

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10 to 13

<p style="text-align: right;">Page 10</p> <p>1 A. Well, it was still a couple minutes till the 2 start of the class. My TAs were getting the, you know, 3 PowerPoint ready and -- and things like that. I -- I 4 asked them if they had received this flyer, and they 5 said that they had. And then when I started class, I 6 took about five minutes to address this and asked 7 students if they had any questions about it. And, you 8 know, I really did not want it to detract too much from 9 class time focusing on the subject, but on the other 10 hand, I did believe it deserved some response.</p> <p>11 Q. Is the five minutes that you spent addressing 12 it that morning in class, is that recorded anywhere?</p> <p>13 A. No, I do not record my classes.</p> <p>14 Q. Is that documented anywhere, what you said?</p> <p>15 A. Not in documentary form, but the two TAs might 16 remember it.</p> <p>17 Q. Well, other than people relying upon their 18 memory who might've heard it, is it recorded anywhere?</p> <p>19 A. No.</p> <p>20 Q. Or documented --</p> <p>21 A. No.</p> <p>22 Q. -- anywhere?</p> <p>23 A. No, because I was speaking extempore. I had no 24 idea this was going to happen.</p> <p>25 Q. Indeed.</p>	<p style="text-align: right;">Page 12</p> <p>1 Q. (BY MR. PRINGLE, JR.) Did you ever say, "What 2 you're saying about me is incorrect"?</p> <p>3 MR. SIBLEY: Objection, form.</p> <p>4 A. I believe all of these things that you are 5 asking are implicit in the statement that it is 6 libelous.</p> <p>7 Q. (BY MR. PRINGLE, JR.) I'm asking explicit. Did 8 you explicitly say any of those things?</p> <p>9 A. I did not use the words that you are using 10 like . . .</p> <p>11 Q. The only thing you said is "This is libelous"?</p> <p>12 A. To my rec -- to the best of my recollection.</p> <p>13 Q. And so tell me what you told the class 14 extempore.</p> <p>15 A. That this was probably the work of a 16 disgruntled former student.</p> <p>17 Oh. The first thing I asked them was, 18 "Have any of you ever heard me advocate pedophilia in 19 this class?"</p> <p>20 And no one raised their hand. They --</p> <p>21 Q. Nobody did that, right?</p> <p>22 A. Yeah. Because, in fact -- although there were 23 a couple of miss -- we discussed the concerted pederast, 24 there was nothing about pedophilia and certainly nothing 25 advocated.</p>
<p style="text-align: right;">Page 11</p> <p>1 So, that morning when you saw the flyer, 2 you read it. Presumably, you -- you understood it, 3 right?</p> <p>4 A. Yes.</p> <p>5 Q. And you told Miss Blakemore that it was 6 libelous?</p> <p>7 A. I did.</p> <p>8 Q. Did you ever deny anything that was in there -- 9 in there?</p> <p>10 MR. SIBLEY: Objection, form.</p> <p>11 A. Stating that it is libelous is itself a 12 statement that there are untruths in the document and 13 that they harm my representation.</p> <p>14 Q. (BY MR. PRINGLE, JR.) Did you ever say, "This 15 is untrue"?</p> <p>16 MR. PRINGLE, JR.: Objection.</p> <p>17 A. No, I did not use that word.</p> <p>18 Q. (BY MR. PRINGLE, JR.) Did you ever say, "This 19 is false"?</p> <p>20 MR. SIBLEY: Objection.</p> <p>21 A. I -- I do not remember using that word.</p> <p>22 Q. (BY MR. PRINGLE, JR.) Did you ever say, "This 23 paints me in a false light"?</p> <p>24 MR. SIBLEY: Objection, form.</p> <p>25 A. I did not use that phrase.</p>	<p style="text-align: right;">Page 13</p> <p>1 Q. Did you ever ask the class if anyone had ever 2 heard you advocating for sex between minor children and 3 adult males?</p> <p>4 A. Not in those terms. But the term she used was 5 "pedophilia."</p> <p>6 And I asked them, "Have you ever heard me 7 advocating that?"</p> <p>8 And -- and no one acknowledged that they 9 had.</p> <p>10 Q. All right. What else did you tell them?</p> <p>11 A. I be -- well, I gave them a chance to ask 12 questions, and, I believe, one student who was sitting 13 in the front row asked me, well, thought about this 14 charge even published for both with NAMBLA.</p> <p>15 Q. Okay. We'll get -- we'll get to the questions 16 in a minute, but maybe we should do it this way. Kind 17 of walk me through the interaction that you had with 18 your class over that five-minute period. First, you 19 asked: Has anybody heard me advocate for pedophilia, 20 and no one raised their hand. True?</p> <p>21 A. Yes.</p> <p>22 Q. Then, you asked what? You said what?</p> <p>23 A. I can't give you the exact sequence of 24 statements. This is sometime ago, and --</p> <p>25 Q. Just do your best.</p>

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14 to 17

<p style="text-align: right;">Page 14</p> <p>1 A. -- I was obviously upset at the time because I 2 thought this would distract the class from what we're 3 supposed to be doing there. I believe that at some 4 point I made the statement that this was the work of a 5 disgruntled student and left it at that.</p> <p>6 Q. And what evidence did you have of that?</p> <p>7 A. My 40 years of experience, that usually what 8 students are upset with me about is they're not doing 9 well --</p> <p>10 Q. Okay.</p> <p>11 A. -- in the class.</p> <p>12 Q. It is -- is it inconceivable to you that a 13 student might be upset at you for another reason?</p> <p>14 A. Well, I know some students from religiously 15 conservative backgrounds may object to my being gay, 16 which I make no attempt to hide. And on the other hand, 17 I also do not proclaim it at the beginning of my class, 18 but, you know, it's something that is widely known about 19 me. Some students may object to there being a sexual 20 content to many of the Greek myths, but you cannot teach 21 Greek Mythology in a comprehensive way if you 22 vulgarize (phonetic) those particular stories because 23 they are an important part of the subject matter. And, 24 you know, students are worried about that at the 25 beginning of the semester.</p>	<p style="text-align: right;">Page 16</p> <p>1 often rape, in the context of ancient Greece, and 2 pederastic relations between adult men and underage 3 boys?</p> <p>4 A. As those things come up in the myth.</p> <p>5 Q. Okay.</p> <p>6 A. And there are a large numbers of the future 7 Gods raping --</p> <p>8 THE REPORTER: I'm sorry, I can't hear the 9 last part. "Future Gods"?</p> <p>10 A. There are a large number of myths about Gods 11 raping mortal women, but I also tell the class that in 12 any story where a human male rapes a woman or a boy, 13 they always come to a bad end and get punished for it.</p> <p>14 Q. (BY MR. PRINGLE, JR.) Okay. Now, is there 15 anything about the flyer that points out that you are 16 gay?</p> <p>17 A. No.</p> <p>18 Q. Do you have any reason to believe that Sarah 19 Blakemore disapproves of you being gay?</p> <p>20 A. Well, when I learned about the political 21 background of her family and their association with Dan 22 Patrick, that thought certainly crossed my mind.</p> <p>23 Q. I'm not asking about thoughts crossing your 24 mind. I'm asking you about evidence. Do you have any 25 evidence that Sarah Blakemore is disapproving of your</p>
<p style="text-align: right;">Page 15</p> <p>1 Q. Why are they worried?</p> <p>2 A. 'Cause some students find any discussion of 3 sexuality offensive. I mean, that has sometimes come up 4 in the written comments that students leave on their 5 course evaluations.</p> <p>6 Q. So --</p> <p>7 A. So, it's not a huge number of students, but in 8 a class of a hundred or two hundred, there are sometimes 9 a couple.</p> <p>10 Q. So, sometimes some of the students leave 11 evaluations or comments on your course where they object 12 to your discussions for the subject matter of, say, rape 13 and pederastic relations back in ancient Greece. Is --</p> <p>14 MR. SIBLEY: Objection.</p> <p>15 Q. (BY MR. PRINGLE, JR.) -- that -- is that fair 16 to say?</p> <p>17 MR. SIBLEY: Objection.</p> <p>18 A. No.</p> <p>19 Q. (BY MR. PRINGLE, JR.) Why not?</p> <p>20 A. 'Cause I do not recall them using those terms. 21 It -- it's usually sexual content or something of that 22 nature.</p> <p>23 Q. All right. It's sexual content that you --</p> <p>24 A. It -- it's something that --</p> <p>25 Q. Yeah, but the sexual consent that you teach is</p>	<p style="text-align: right;">Page 17</p> <p>1 status as a gay man?</p> <p>2 MR. SIBLEY: Objection, form.</p> <p>3 Q. (BY MR. PRINGLE, JR.) Any evidence?</p> <p>4 MR. SIBLEY: Objection, form.</p> <p>5 A. We have not found any explicit statements from 6 her saying that. So, in terms of evidence, no.</p> <p>7 Q. (BY MR. PRINGLE, JR.) Have you --</p> <p>8 A. It was just an educated guess, which is all I 9 could do.</p> <p>10 Q. Have you found any implicit statements?</p> <p>11 A. Only --</p> <p>12 Q. Was there --</p> <p>13 A. -- the -- only the fact that there is 14 widespread public association of gay males with underage 15 relations. And I can document this through public 16 opinion polling and through a number of articles that 17 you can find on the internet from social conservative 18 groups, like the American Family Association and people 19 associated with, what we would call, religious 20 fundamentalists.</p> <p>21 Q. Is Sarah Blakemore a religious fundamentalist?</p> <p>22 A. I don't know.</p> <p>23 Q. You don't have any -- you don't know one way or 24 the other, do you?</p> <p>25 A. All I know is that her father's biography says</p>

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18 to 21

<p style="text-align: right;">Page 18</p> <p>1 they're Presbyter -- that he is Presbyterian --</p> <p>2 Q. All right.</p> <p>3 A. -- and a member of a Presbyterian church in</p> <p>4 Houston.</p> <p>5 Q. Well, you don't believe that all Presbyterians</p> <p>6 are religious fundamentalists, do you?</p> <p>7 A. No. I -- I -- in fact, it's considered one of</p> <p>8 the more progressive positive denominations.</p> <p>9 Q. All right. So, again, do you have any evidence</p> <p>10 whatsoever that Sarah Blakemore is in any way</p> <p>11 disapproving of you as a gay male?</p> <p>12 MR. SIBLEY: Objection, form.</p> <p>13 A. Only a guess based on her family's association</p> <p>14 with Dan Patrick, who is well evidenced as being</p> <p>15 disapproving of gay.</p> <p>16 (BY MR. PRINGLE, JR.) So, the only evidence you</p> <p>17 have is just there is that evidence?</p> <p>18 A. Yes.</p> <p>19 Q. And based on that, you think she's a religious</p> <p>20 fundamentalist?</p> <p>21 A. No, but children at -- young people at that age</p> <p>22 often tend to be influenced by their parents' values.</p> <p>23 Q. And what analysis have you done on Sarah to</p> <p>24 reach that conclusion for her? Zero?</p> <p>25 MR. SIBLEY: Objection, form.</p>	<p style="text-align: right;">Page 20</p> <p>1 THE REPORTER: I need you to speak up,</p> <p>2 Counsel.</p> <p>3 MR. SIBLEY: Objection, form. It's always</p> <p>4 gonna be objection, form probably every time I speak.</p> <p>5 THE REPORTER: Thank you, but I may not</p> <p>6 even hear the objection, sir, so I need you to speak --</p> <p>7 MR. SIBLEY: Okay.</p> <p>8 THE REPORTER: -- up.</p> <p>9 MR. SIBLEY: I'm just letting you know</p> <p>10 that we -- you weren't here earlier, so we agreed that</p> <p>11 every objection will be objection, form. So, that's it.</p> <p>12 MR. PRINGLE, JR.: Do you just wanna say,</p> <p>13 "Objection"?</p> <p>14 MR. SIBLEY: Yeah, I'm just gonna say,</p> <p>15 "Objection."</p> <p>16 MR. PRINGLE, JR.: Yeah.</p> <p>17 A. Could we, perhaps, bring the computer closer so</p> <p>18 she can --</p> <p>19 MR. SIBLEY: Yeah --</p> <p>20 A. -- hear better?</p> <p>21 MR. PRINGLE, JR.: It's a good idea.</p> <p>22 THE VIDEOGRAPHER: I'll grab it.</p> <p>23 MR. PRINGLE, JR.: And do you want to go</p> <p>24 closer than that?</p> <p>25 THE WITNESS: You have a projector.</p>
<p style="text-align: right;">Page 19</p> <p>1 A. The people who have looked at her Facebook page</p> <p>2 said that she was -- had proved that she has -- as part</p> <p>3 of her bio of self presentation there, that she said she</p> <p>4 was interested in Republican politics, which was not at</p> <p>5 all surprising, to me, given her having involvement of</p> <p>6 the rest of her family.</p> <p>7 (BY MR. PRINGLE, JR.) But that's not something</p> <p>8 you have any personal knowledge of, is it?</p> <p>9 MR. SIBLEY: Objection, form.</p> <p>10 A. No, because I don't know her, her or her</p> <p>11 family.</p> <p>12 (BY MR. PRINGLE, JR.) Well, you don't have any</p> <p>13 knowledge of her -- of her social media postings, do</p> <p>14 you?</p> <p>15 A. Not directly. I've only been told by others</p> <p>16 who examined.</p> <p>17 Q. You have hearsay evidence from other people,</p> <p>18 correct?</p> <p>19 MR. SIBLEY: Objection, form.</p> <p>20 A. You could call it that, but from other people I</p> <p>21 trust.</p> <p>22 (BY MR. PRINGLE, JR.) Yeah. What would you</p> <p>23 call it if not hearsay evidence?</p> <p>24 MR. SIBLEY: Objection, form.</p> <p>25 A. That would --</p>	<p style="text-align: right;">Page 21</p> <p>1 MR. PRINGLE, JR.: Yeah. I'd rather have</p> <p>2 with the -- this is in everything they -- frame a little</p> <p>3 bit -- that's okay. I'd rather have her hearing well.</p> <p>4 THE WITNESS: Yeah, you may have to lean.</p> <p>5 (BY MR. PRINGLE, JR.) All right. So, you --</p> <p>6 after the five-minute period in which you were -- you</p> <p>7 were concerned about the disruption to your class --</p> <p>8 A. Uh-huh.</p> <p>9 Q. -- did you go ahead and teach the class?</p> <p>10 A. Yes.</p> <p>11 Q. And what happened next in this ongoing saga?</p> <p>12 What did you do next?</p> <p>13 A. You mean after finishing the class?</p> <p>14 Q. Yes.</p> <p>15 A. I went back to the office with my TAs. My</p> <p>16 office is in a different building.</p> <p>17 Q. And your -- your TAs at the time who were with</p> <p>18 you that day are who?</p> <p>19 A. As I have stated before: John Anderson and</p> <p>20 Alain Zaramian.</p> <p>21 Q. And where is John now?</p> <p>22 A. He is still a graduate student in our</p> <p>23 department. I do not know specifically if he's in</p> <p>24 Austin, but he probably is.</p> <p>25 Q. Okay. So, you went back to your office, and</p>

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22 to 25

<p style="text-align: right;">Page 22</p> <p>1 did you have discussions with John and Alain?</p> <p>2 A. I think so, but I -- I -- I -- I don't remember</p> <p>3 very much about the exact content of those discussions,</p> <p>4 other than the incident was very jarring to all of us.</p> <p>5 Very upsetting, so there was some discussion.</p> <p>6 Q. Did you report it?</p> <p>7 A. You mean report it to other university</p> <p>8 authorities?</p> <p>9 Q. Report it to anybody, including the university</p> <p>10 authorities.</p> <p>11 A. Not that day, but, I think, the next day I</p> <p>12 received a call from the Provost's office, saying that</p> <p>13 they had detected a lot of social media chatter</p> <p>14 targeting me and they were concerned by it and concerned</p> <p>15 for my safety.</p> <p>16 Q. I see. And did you ever review any of that</p> <p>17 social media chatter?</p> <p>18 A. I make no use of social media. I think it is a</p> <p>19 sewer and poison. I absolutely abhor it.</p> <p>20 Q. So, I take it by the answer, you didn't. You</p> <p>21 never reviewed any social media posts; is that correct?</p> <p>22 A. No, but other people I know and trust did.</p> <p>23 Q. All right. But in terms of having personal</p> <p>24 knowledge of social media posts, you have zero, correct?</p> <p>25 A. Yes, other than what has been since given to us</p>	<p style="text-align: right;">Page 24</p> <p>1 something?</p> <p>2 MR. PRINGLE, JR.: That's probably it.</p> <p>3 Thank you. Voilà.</p> <p>4 Q. (BY MR. PRINGLE, JR.) Okay. And let's look at</p> <p>5 these in reverse order, Professor.</p> <p>6 A. Okay.</p> <p>7 Q. And I don't know this is the first</p> <p>8 communication, but it's an early communication. Are you</p> <p>9 with me on the November 30 -- November 23, 2019, 2:28</p> <p>10 e-mail that you sent to David --</p> <p>11 A. Ochsner.</p> <p>12 Q. -- Ochsner?</p> <p>13 And who's David Ochsner?</p> <p>14 A. He is the assistant dean for communications.</p> <p>15 And Carmen Shockley -- I -- I told Carmen Shockley that</p> <p>16 the one thing the university could help me with was in</p> <p>17 formulating a response to this so that we could tamp it</p> <p>18 down and, you know, have less disturbance of my</p> <p>19 students, as well as me. And she recommended that I get</p> <p>20 in touch with the communications director within my</p> <p>21 college, and that is David Ochsner.</p> <p>22 Q. Well, then, maybe we should -- we should talk</p> <p>23 about this e-mail after we talk about the other e-mails.</p> <p>24 A. Uh-huh.</p> <p>25 (Exhibit 4 marked)</p>
<p style="text-align: right;">Page 23</p> <p>1 in discovery.</p> <p>2 Q. Sure. But at the time, you had --</p> <p>3 A. No.</p> <p>4 Q. -- no knowledge of?</p> <p>5 All right. Who was the provost that you</p> <p>6 had interactions with?</p> <p>7 A. Initially, it was Carmen Shockley, who was, I</p> <p>8 think, an assistant. An assistant to Janet Dukerich,</p> <p>9 who was herself a vice provost.</p> <p>10 (Exhibit 3 marked)</p> <p>11 Q. (BY MR. PRINGLE, JR.) Okay. We have -- you</p> <p>12 have Exhibit 3 there in front of you.</p> <p>13 A. Uh-huh.</p> <p>14 MR. SIBLEY: Can I get a copy of it?</p> <p>15 MR. PRINGLE, JR.: Yeah, you copy that.</p> <p>16 Are you sure I haven't given you a copy?</p> <p>17 MR. SIBLEY: Yes. I've got two here.</p> <p>18 MR. PRINGLE, JR.: Huh.</p> <p>19 A. I mean, do you want me to review all of these</p> <p>20 pages, or --</p> <p>21 Q. (BY MR. PRINGLE, JR.) Uh . . .</p> <p>22 A. -- you'll go through them one by one?</p> <p>23 Q. I was gonna go through them, but I seem to have</p> <p>24 misplaced my copy. Let me just look at it real quick.</p> <p>25 UNIDENTIFIED FEMALE SPEAKER: Joe, is this</p>	<p style="text-align: right;">Page 25</p> <p>1 Q. (BY MR. PRINGLE, JR.) Let's look at Exhibit No.</p> <p>2 4. Keep that handy or it'll disappear in the pile.</p> <p>3 This is -- if you look at the -- at the bottom or the</p> <p>4 back e-mail.</p> <p>5 A. You mean on page 1 or the very last page?</p> <p>6 Q. The very last page. It looks like it's a</p> <p>7 e-mail: Friday, November 22nd, at 6:57 p.m. That's the</p> <p>8 next day.</p> <p>9 A. Friday, November 22nd. That's not in Exhibit</p> <p>10 4.</p> <p>11 Q. Really? On the last page of your --</p> <p>12 A. I have only three pages, but it says it's 4 of</p> <p>13 6, 5 of 6, and 6 of 6 --</p> <p>14 Q. Okay.</p> <p>15 A. -- so I think some pages are missing.</p> <p>16 Q. See that?</p> <p>17 A. Oh.</p> <p>18 Q. Is that when you sent the flyer to Janet</p> <p>19 Dukerich?</p> <p>20 A. Yes. I -- I think she asked to see that.</p> <p>21 Q. And then there's a notation of the quoted text</p> <p>22 hidden. What did you tell Janet Dukerich that we can't</p> <p>23 see on this e-mail; do you know?</p> <p>24 A. I don't know.</p> <p>25 Q. You still have this e-mail?</p>

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26 to 29

<p style="text-align: right;">Page 26</p> <p>1 A. I could probably find it.</p> <p>2 Q. You haven't destroyed or -- or discarded any</p> <p>3 e-mails relating to this dispute, have you?</p> <p>4 A. No. No, because I was very strongly warned by</p> <p>5 my counsel not to do that.</p> <p>6 Q. All right. And then there's a e-mail to</p> <p>7 Sherrard Butch Hayes?</p> <p>8 A. Uh-huh.</p> <p>9 Q. Who is that?</p> <p>10 A. That is one of my other attorneys.</p> <p>11 Q. And does he -- does Mr. Hayes represent you in</p> <p>12 this matter at all?</p> <p>13 A. Not in the likeness.</p> <p>14 Q. What does Mr. Hayes represent you on?</p> <p>15 A. Our dealings with the University of Texas.</p> <p>16 Q. Is there a separate lawsuit over that?</p> <p>17 A. Not yet.</p> <p>18 Q. Uh . . .</p> <p>19 A. There is an EEOC complaint.</p> <p>20 Q. And Mr. Hayes represents you in an EEOC</p> <p>21 complaint?</p> <p>22 A. Yes.</p> <p>23 Q. And an EEOC complaint, for the members of the</p> <p>24 jury, is an Equal Employment Opportunity Commission</p> <p>25 complaint?</p>	<p style="text-align: right;">Page 28</p> <p>1 I also complained that the -- that this</p> <p>2 had very much harmed the reputation of UT Austin in</p> <p>3 public media. I mean, the -- the whole letter was about</p> <p>4 ten pages. And we felt that President Fenves and</p> <p>5 university communications response to the attack upon me</p> <p>6 by the defendant were not only unhelpful but actually</p> <p>7 exacerbated the situation and that he was retaliating</p> <p>8 for my having critiqued that study. I have seen later</p> <p>9 information, from Chancellor McRaven, to the effect that</p> <p>10 the Regents took my complaint very seriously and that</p> <p>11 there was quite a debate about whether to continue</p> <p>12 funding that study.</p> <p>13 Q. Again, do you remember what my question was?</p> <p>14 A. Your -- your question was about my EEOC</p> <p>15 complaint and the basis for retali -- claiming</p> <p>16 retaliation.</p> <p>17 Q. No, sir. That's false.</p> <p>18 My question to you was, are you making</p> <p>19 a -- a claim in your EEOC complaint about the -- your --</p> <p>20 your freedom of speech?</p> <p>21 MR. SIBLEY: Objection, form.</p> <p>22 A. What I said was --</p> <p>23 Q. (BY MR. PRINGLE, JR.) That's a yes or no</p> <p>24 question.</p> <p>25 MR. SIBLEY: Objection, form.</p>
<p style="text-align: right;">Page 27</p> <p>1 A. Yes.</p> <p>2 Q. You are making a sex discrimination claim</p> <p>3 against yourself?</p> <p>4 A. Against myself? What do you mean by that?</p> <p>5 Q. Are you making a sex discrimination claim on</p> <p>6 your behalf? Do you think that you've been sex</p> <p>7 discriminated on behalf of -- on -- on the basis of your</p> <p>8 sex?</p> <p>9 A. Sex, sexual orientation, and retaliation for</p> <p>10 protected speech.</p> <p>11 Q. You're making an EEOC complaint on the be --</p> <p>12 behalf of -- on the basis of protected speech?</p> <p>13 A. Yes, because, in 2017, I sent to President</p> <p>14 Fenves and cc'd the Board of Regents a detailed critique</p> <p>15 of a 1.7 million dollar study produced by an institute</p> <p>16 in the School of Social Work that purported to report a</p> <p>17 shockingly high rate of sexual assault and sexual</p> <p>18 harassment at UT Austin. After reviewing that document</p> <p>19 and the documentation behind that document and</p> <p>20 discussing it with social scientists who are experienced</p> <p>21 and knowledgeable in the area of sexological research, I</p> <p>22 concluded that that document was fatally flawed, used a</p> <p>23 bias sampling technique, asked confusing questions, and</p> <p>24 greatly overrepresented the rate of sexual assault and</p> <p>25 sexual harassment at the university.</p>	<p style="text-align: right;">Page 29</p> <p>1 A. Yes.</p> <p>2 Q. (BY MR. PRINGLE, JR.) There you go.</p> <p>3 A. Protected speech is freedom of speech.</p> <p>4 Q. Yes. Okay. Let's go to page 5 of 6 of this</p> <p>5 exhibit that we're looking at, Exhibit 4.</p> <p>6 A. Page of 5 of 6. Okay.</p> <p>7 Q. You see that?</p> <p>8 A. Uh-huh.</p> <p>9 Q. And that's your e-mail to Janet and Carmen,</p> <p>10 November 29, 2019.</p> <p>11 A. Uh-huh.</p> <p>12 Q. Yes?</p> <p>13 A. Yes.</p> <p>14 Q. And do you -- you post a picture of my client</p> <p>15 from her way -- Facebook page, correct?</p> <p>16 A. Yes. Yes.</p> <p>17 Q. And you say that she's posing on her Facebook</p> <p>18 page with an assault rifle.</p> <p>19 A. That's what it -- that's what it looks like to</p> <p>20 me, but I have never touched a gun. I don't know guns.</p> <p>21 And the whole definition of what is an assault rifle is</p> <p>22 something that is very much controverted.</p> <p>23 Q. So, then, why would you report that she's</p> <p>24 posing what -- what appears to be an assault rifle if</p> <p>25 you don't even know what one is?</p>

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30 to 33

<p style="text-align: right;">Page 30</p> <p>1 MR. SIBLEY: Objection, form.</p> <p>2 A. It is certainly -- it certainly looks like a 3 high powered rifle, and, you know, she's posing with a 4 dead deer.</p> <p>5 Q. (BY MR. PRINGLE, JR.) Yeah, I see that.</p> <p>6 You indicate that she appeared obviously 7 unstable.</p> <p>8 A. Yes, she -- she was very nervous when she 9 handed the flyer to me.</p> <p>10 Q. Well, nervous is not unstable, is it? Or is 11 it, in your mind?</p> <p>12 A. I believe that the attempt to smear me in this 13 confrontational way would not be the action of a 14 well-balanced and mature person and that, you know, a -- 15 a -- a more stable person would have, first, come to 16 talk to me to express her concerns or misunderstandings 17 of my scholarship.</p> <p>18 Q. Do you know whether or not Sarah Blakemore was 19 unwilling to talk to you as, you reported, other 20 undergraduates were unwilling to interact with you?</p> <p>21 MR. SIBLEY: Objection.</p> <p>22 A. I know of no evidence of other undergraduates 23 being unwilling to do so.</p> <p>24 Q. (BY MR. PRINGLE, JR.) No --</p> <p>25 A. Do you have any?</p>	<p style="text-align: right;">Page 32</p> <p>1 rights were one of her interests. And, to me, this 2 picture is itself child pornography.</p> <p>3 Q. How old is she in that picture?</p> <p>4 A. She looks about 15.</p> <p>5 Q. And you say that's child pornography. Why do 6 you say that?</p> <p>7 A. There is a certain genre of pornography, I 8 mean, called Chicks with Guns, and I think this is -- 9 although not pornographic in the sense of nudity, I feel 10 this photo exploits an underage person to advance -- 11 to -- to appeal to people who are preoccupied with guns 12 and gun rights. And -- and from my perspective, of 13 someone who has never touched a gun, would never have 14 one in his house, and who is rather frightened by them, 15 I -- I -- I find this objectionable.</p> <p>16 Q. And you think the picture that's in Exhibit 4 17 of my client posing with a deer that she's killed is 18 child pornography, is that what you said?</p> <p>19 A. Not in the literal sense of the term, but in a 20 figurative sense. And I do recall talking with a -- one 21 of the journalists who wrote about this, and she said 22 that she also considered it child pornography.</p> <p>23 Q. Okay. And you think there's something 24 seriously wrong with Sarah distributing this flyer -- 25 this flyer, correct?</p>
<p style="text-align: right;">Page 31</p> <p>1 Q. No complaints, but it's in the first exhibit, 2 didn't we, from Mr. White?</p> <p>3 MR. SIBLEY: Objection.</p> <p>4 A. White had no credibility with me and he 5 ultimately could not produce any documentation of what 6 he said.</p> <p>7 Q. (BY MR. PRINGLE, JR.) And no students came 8 forward, did they?</p> <p>9 MR. SIBLEY: Objection.</p> <p>10 A. You mean after the distribution of her flyer?</p> <p>11 Q. (BY MR. PRINGLE, JR.) I'll move on.</p> <p>12 A. Now, you have to be more specific in your 13 questions.</p> <p>14 Q. Well, I will. I will. That's why I'm moving 15 on.</p> <p>16 So, then, you raised this with the 17 university behavioral concerns hotline, correct?</p> <p>18 A. No. I asked Janet Dukerich and Carmen Shockley 19 whether I should.</p> <p>20 Q. Why didn't you raise it?</p> <p>21 A. I -- I sought their advice first. I mean, they 22 are more experienced in these matters than I am.</p> <p>23 Q. And why did that even cross your mind?</p> <p>24 A. Well, this is someone who uses guns. And what 25 I was told about her Facebook page was she said that gun</p>	<p style="text-align: right;">Page 33</p> <p>1 A. Yes.</p> <p>2 Q. And you indicate that "We cannot take the 3 chance of another mass shooting at this university."</p> <p>4 Why did you say that?</p> <p>5 A. Well, one of the most famous things about the 6 University of Texas is the shooting from the tower.</p> <p>7 Q. Were you implying that my client was capable of 8 that?</p> <p>9 A. Who knows. She likes guns.</p> <p>10 Q. So, you --</p> <p>11 A. To my mind, she was unstable.</p> <p>12 Q. So, you were implying she was capable of mass 13 shooting from the tower on campus; is that right?</p> <p>14 A. Not from the tower --</p> <p>15 MR. SIBLEY: Objection.</p> <p>16 A. -- because that has been closed.</p> <p>17 Q. (BY MR. PRINGLE, JR.) All right. I'll --</p> <p>18 A. I mean --</p> <p>19 Q. -- accept your friendly amendment to the 20 question.</p> <p>21 You were implying that my client was 22 capable of a mass shooting on the -- on the campus of 23 the University of Texas because of this child 24 pornography, photograph you saw of her posing with a 25 gun -- with a -- a deer that she had shot in her</p>

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<p style="text-align: right;">Page 34</p> <p>1 youth --</p> <p>2 MR. SIBLEY: Objection.</p> <p>3 Q. (BY MR. PRINGLE, JR.) -- is that right?</p> <p>4 A. Any human being with a gun is capable of a mass shooting. That is precisely why so many politicians want to regulate gun ownership.</p> <p>5 Q. So, is the question to my an -- is the answer to my question, yes, you were implying she was capable of that?</p> <p>6 A. Yes.</p> <p>7 Q. Even though you never talked to her, correct?</p> <p>8 A. Other than in that one confrontation.</p> <p>9 Q. And even though you had no first-hand knowledge about her at all, only based on what your associates have told you?</p> <p>10 A. Yes. I think at that time, it was based on, you know, what I had been told about the social --</p> <p>11 Q. And that was the extent of your research before you made these statements about my client, correct?</p> <p>12 A. As I have said, any human being with a gun is capable of doing bad things with it.</p> <p>13 Q. So, you did absolutely nothing to verify any facts about my client before you made this statement implying that she could shoot up the University of Texas campus, did you?</p>	<p style="text-align: right;">Page 36</p> <p>1 interference from the university's legal affairs office about, rather, I was revealing for a protected information of -- because they, apparently, even consider the student's name to be FERPA protected, and they were interfering with my ability to distribute this to the e-mail Listserv for my class and to the e-mail Listserv of graduate students in my department. Because I was very worried about the effect this would be having on them.</p> <p>2 MR. PRINGLE, JR.: Okay. Objection, nonresponsive.</p> <p>3 Q. (BY MR. PRINGLE, JR.) Well, let's look at the last e-mail on the last page of Exhibit 4. So, you indicate -- and there's three paragraphs in that e-mail. The last phrase of the second paragraph's reference -- references your research, "which the activists have not even taken the time to read or understand."</p> <p>4 You see that?</p> <p>5 A. May I have time to read the entire e-mail?</p> <p>6 Q. You certainly may.</p> <p>7 A. Yes, what was your question about it?</p> <p>8 Q. How do you know the activists hadn't taken the time to read or understand your publications?</p> <p>9 A. Because the allegations were so appallingly simpleminded. That, no one who has read my work in its</p>
<p style="text-align: right;">Page 35</p> <p>1 MR. SIBLEY: Objection.</p> <p>2 A. The only thing that I did was ask certain people who were friendly to me to find out more about her, and they looked up her social media and sent me this, and this frightened me. I mean, you have to understand that after the classroom disruption, on November 21st, I was very agitated and -- and nervous, and I had good reason to be given what happened later.</p> <p>3 MR. PRINGLE, JR.: Objection, nonresponsive.</p> <p>4 Q. (BY MR. PRINGLE, JR.) Okay. Let's go to Exhibit 4 now -- I mean Exhibit 3 now. This is a series of e-mails that you had with Janet and others after the incident, correct?</p> <p>5 A. Yes.</p> <p>6 Q. You ultimately drafted a response to the flyer, correct?</p> <p>7 A. With the aid of Avi Underwood --</p> <p>8 Q. Okay.</p> <p>9 A. -- who was more experienced media relations. We also ran it by David Ochsner.</p> <p>10 Q. So, you ultimately issued some sort of a statement responding to the flyer, correct?</p> <p>11 A. Yes, but it -- it could only be posted a couple of weeks later, because I was experiencing some</p>	<p style="text-align: right;">Page 37</p> <p>1 totality could possibly believe the things that she stated.</p> <p>2 Q. That's according to you. But, how do you know that the activists hadn't taken the time to, at least, read your material?</p> <p>3 MR. SIBLEY: Objection.</p> <p>4 Q. (BY MR. PRINGLE, JR.) You don't know that, do you?</p> <p>5 MR. SIBLEY: Objection.</p> <p>6 A. You are asking an epistemological question.</p> <p>7 Q. (BY MR. PRINGLE, JR.) Well, thank you.</p> <p>8 A. No one knows anything with certainty. All I can do is judge a situation based upon probabilities, and I do believe -- and I still believe -- that the probability is that they had not made a careful study of the totality and context of my work or of other scholarship in that field.</p> <p>9 Q. So, then, can we agree that you don't know whether any of the people that have criticized you read your work?</p> <p>10 MR. SIBLEY: Objection.</p> <p>11 A. On an epistemological level, yes, we can agree to that.</p> <p>12 Q. (BY MR. PRINGLE, JR.) I don't know what "epistemological" means.</p>

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<p style="text-align: right;">Page 38</p> <p>1 A. Well, perhaps my counsel, who was a philosophy 2 major, could explain. Epistemology is the branch of 3 philosophy that has to do with knowledge and 4 presumption.</p> <p>5 Q. Personal knowledge?</p> <p>6 MR. SIBLEY: Objection.</p> <p>7 A. All knowledge.</p> <p>8 Q. (BY MR. PRINGLE, JR.) You don't have any -- you 9 know what personal knowledge is?</p> <p>10 A. Direct personal familiarity with something?</p> <p>11 Q. No, you can't use "personal" in the definition. 12 You know what personal knowledge is?</p> <p>13 MR. SIBLEY: Objection.</p> <p>14 Q. (BY MR. PRINGLE, JR.) What you see, hear, 15 touch, feel, experience with your own five senses. Not 16 what someone else tells you. Not what you assume. Not 17 what you believe. That's what personal knowledge is.</p> <p>18 MR. SIBLEY: Objection.</p> <p>19 A. The philosophical term for what you describe is 20 sensation.</p> <p>21 Q. (BY MR. PRINGLE, JR.) Perfect. Do you have any 22 personal knowledge as to whether any of your -- these 23 activists ever read any of your work?</p> <p>24 MR. SIBLEY: Objection.</p> <p>25 A. Not with my five senses. I only have an</p>	<p style="text-align: right;">Page 40</p> <p>1 convicted child molesters in prison?</p> <p>2 MR. SIBLEY: Objection.</p> <p>3 A. They are not members of my own family, and I do 4 not have such intimate knowledge of them, as Sarah 5 Blakemore would have of her father and her other family. 6 And the -- any correspondence that we receive from 7 prison is -- is part of our research on what makes these 8 people do the things that they do.</p> <p>9 Again, if one looks at the totality of my 10 scholarship, one knows -- and this includes some of the 11 scholarship you have received on your subpoena -- one 12 knows that I am not of the same orientation or view as 13 people who molest children.</p> <p>14 Q. (BY MR. PRINGLE, JR.) And you don't know 15 whether Sarah is of the same orientation and view as her 16 father, do you?</p> <p>17 A. Not with epistemological certainty.</p> <p>18 Q. Or with any certainty? You wouldn't be able to 19 swear to it, would you?</p> <p>20 A. No.</p> <p>21 Q. 'Cause you'd be guessing?</p> <p>22 MR. SIBLEY: Objection.</p> <p>23 A. I would be guessing based upon what I perceive 24 as probabilities. But again, all that you are talking about is -- is known from Philosophy 101: No one has</p>
<p style="text-align: right;">Page 39</p> <p>1 educated guess.</p> <p>2 Q. (BY MR. PRINGLE, JR.) You can only reach 3 conclusions; is that right?</p> <p>4 A. Conclusions based upon probabilities.</p> <p>5 Q. As you define them?</p> <p>6 A. That -- that's what we all do, given that human 7 knowledge is, by definition, imperfect. Anyone with any 8 knowledge of the history of philosophy knows that.</p> <p>9 Q. You also say in this next e-mail, on Sunday, 10 November 24, 2019: Her father is a prominent re -- 11 republican political publicist and campaign strategist 12 in Houston.</p> <p>13 A. Uh-huh. Yes.</p> <p>14 Q. And that's based on what people have told you?</p> <p>15 A. No, I did look up her father's website.</p> <p>16 Q. Okay. And then you say: So this attack may be 17 coming from the social conservative right.</p> <p>18 Again, you're guessing about that, right?</p> <p>19 A. It is an educated guess based upon her father's 20 touting his association with Dan Patrick and other 21 candidates who are on the more right-wing side of the 22 republican party of Texas.</p> <p>23 Q. Well, how would that be any different from 24 assuming that your writings and your thoughts are 25 associated with the people you associate with: The</p>	<p style="text-align: right;">Page 41</p> <p>1 certain knowledge of anything. In fact, Plato says we 2 don't -- have certain knowledges even from our five 3 senses.</p> <p>4 Q. (BY MR. PRINGLE, JR.) So, why is it important 5 that her father is a prominent republican political 6 publicist and campaign strategist? Why is that 7 important?</p> <p>8 A. Because to an educated guess, that suggests 9 political motivation to be attacked.</p> <p>10 Q. Educated guess, meaning your guess?</p> <p>11 MR. SIBLEY: Objection.</p> <p>12 A. Mine and that of others.</p> <p>13 Q. (BY MR. PRINGLE, JR.) The people that did the 14 research for you?</p> <p>15 A. Yes.</p> <p>16 Q. Anybody else?</p> <p>17 A. Not that I can remember.</p> <p>18 Q. And the next e-mail up -- it's on this page 19 that looks like this -- it says: Here is some research 20 a friend of mine did on the student organizer's father 21 who's Dan Patrick's main campaign strategist."</p> <p>22 A. Okay. Excuse me, which page?</p> <p>23 Q. I'm reading from your e-mail of Sunday, 24 November 24, at 10:21 p.m. It's an e-mail to David 25 Ochsner.</p>

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42 to 45

	Page 42	Page 44
1	A. Okay. I see it.	1 Q. Well, it's November 25, at 12:25.
2	Q. You with me?	2 A. Okay. I have it now.
3	A. Yes.	3 Q. You with me?
4	Q. You say: These are very, very dangerous	4 A. Yes.
5	people.	5 Q. All right. You say that -- me see.
6	A. Yes.	6 Sarah struck me -- she, Sarah, struck me
7	Q. Now, what evidence do you have that my client	7 as very neurotic in that state -- well, now you say
8	or her father are -- are dangerous people -- very, very	8 she's neurotic.
9	dangerous people?	9 What evidence do you have that she's
10	A. If the district attorney of Harris County would	10 neurotic?
11	call someone Darth Vader, suggests that they are	11 MR. SIBLEY: Objection.
12	dangerous.	12 A. I -- I -- I don't say that I know she's
13	Q. Is that the basis of that statement?	13 neurotic. I say, my subjective impression is that she
14	A. (No verbal response.)	14 is based upon her behavior during the confrontation and
15	Q. Anything else?	15 her failure to do what any responsible student would've
16	A. I believe that the social conservative wing of	16 done if they had genuine concerns about my scholarship,
17	the republican party is dangerous.	17 which is talk to me about it.
18	Q. Okay. Anything else?	18 Q. (BY MR. PRINGLE, JR.) Anything else that, in
19	A. That's it.	19 Point 2, that would justify your impression she's
20	Q. Okay. You didn't say: These are very, very	20 neurotic other than writing up the flyer?
21	conservative people, did you?	21 MR. SIBLEY: Objection.
22	A. No.	22 A. The contention that I'm a danger to students' safety with no evidence whatever.
23	Q. You said: There very, very dangerous people.	24 Q. (BY MR. PRINGLE, JR.) You go on to say --
24	They can inflict harm?	25 anything else?
25	MR. SIBLEY: Objection.	
	Page 43	Page 45
1	A. They can inflict harm upon sexual and gender --	1 A. If someone thinks that ideas threaten their
2	yes.	2 safety, to my mind, that is neuroticism. And
3	Q. (BY MR. PRINGLE, JR.) And the basis of your	3 particularly, if this is a female, and my ideas have to
4	statement of claiming that Sarah and her father are	4 do with all male relations, how could shh -- how could
5	very, very dangerous people that can inflict harm on	5 that person credibly and rationally think I am a danger
6	people is based on -- is it anything other than your	6 to them? Because, in fact, my position is that the age
7	epistemo -- epistemological speculation?	7 of consent should remain what it currently is for
8	MR. SIBLEY: Objection.	8 females.
9	A. It is based upon her family's close association	9 Q. Anything else?
10	with Dan Patrick, who has made statements to the effect	10 A. It's very clear from the context this is an
11	that the -- or that -- that the massacre at the gay	11 impression.
12	nightclub in Orlando was people reaping what they sow.	12 Q. Sure, and I'm just asking the basis of that
13	I think that is a very dangerous statement.	13 impression.
14	Q. (BY MR. PRINGLE, JR.) Anything else?	14 A. That's the basis.
15	A. That was it.	15 Q. So, No. 1, she -- she issued a flyer, handed it
16	Q. Okay. Let's go to the pay -- your e-mail of	16 out; No. 2, was that she seemed very nervous; is that
17	Monday, November 25, 2019, 12:25.	17 right?
18	A. Uh-huh. Yes.	18 A. Yes.
19	Q. You need to turn the page a couple pages. Back	19 Q. And, No. 3, she indicated that there was -- she
20	towards the front.	20 had concerns about students' safety, where only your
21	A. Well, you're not talking -- I mean, there's one	21 ideas only affect boys and not girls, correct?
22	on this page that's November 25th. Who was the e-mail	22 A. I think that would be correct.
23	addressed to?	23 Q. All right. You go on to say "he." I think you
24	Q. It's addressed do David Ochsner, at 12:25 p.m.	24 probably meant "she."
25	A. Oh, 12:25. Okay. Oh.	25 "She not even know it yet, but she may

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46 to 49

<p style="text-align: right;">Page 46</p> <p>1 have acquired from him homophobic attitudes and the 2 notion that misrepresenting people's ideas is a 3 legitimate motus operandi."</p> <p>4 What's the basis of that statement?</p> <p>5 A. The "he" is correct. It refers to her father.</p> <p>6 Q. Oh, okay.</p> <p>7 A. Because I was genuinely uncertain whether her 8 father knew about this in advance or not.</p> <p>9 Q. Ah. I see. But you speculate that Sarah may 10 have acquired some sort of homophobic attitudes?</p> <p>11 A. The fact that her family continues to closely 12 associate with Dan Patrick, who does exhibit homophobic 13 attitudes, led me to think that was probable.</p> <p>14 Q. So, you think it's probable that Sarah has 15 homophobic attitudes because Dan Patrick is his -- is 16 her father's client? Is that your educated guess?</p> <p>17 MR. SIBLEY: Objection.</p> <p>18 A. My wording is "may have." That is not a 19 statement of fact.</p> <p>20 Q. (BY MR. PRINGLE, JR.) Is that your educated 21 guess though?</p> <p>22 A. Yes, that and the fact that she attacked me in 23 this way, which is based on the widespread public 24 prejudice that gay men tend to be pedophiles.</p> <p>25 Q. You would agree, would you not, sir, that a</p>	<p style="text-align: right;">Page 48</p> <p>1 allowed this to mushroom to the level that it then 2 created violence of.</p> <p>3 Q. What was the pseudo-evidence that you suggested 4 be taken down and buried that might be detrimental -- 5 detrimental to you?</p> <p>6 A. Claims that I associate with pedophiles because 7 I work with prisoners. Some of those claims were 8 implicit in your questions.</p> <p>9 Q. Say that again.</p> <p>10 A. Claims that I associate or encourage pedophiles 11 because I work with prisoners who are guilty of child 12 molestation.</p> <p>13 Q. And in that regard, you do associate with 14 pedophiles, true?</p> <p>15 A. Depends --</p> <p>16 MR. SIBLEY: Objection.</p> <p>17 A. -- what you mean by the word "associate."</p> <p>18 Q. (BY MR. PRINGLE, JR.) So, in some manner, 19 depending on what you mean by the word "associate," you 20 would agree with that, correct?</p> <p>21 MR. SIBLEY: Objection.</p> <p>22 A. I have listened to them. If listening means 23 association, then we're all associating with each other 24 in total.</p> <p>25 Q. Indeed we are, sir.</p>
<p style="text-align: right;">Page 47</p> <p>1 person can oppose sex between adults and minors and not 2 be homophobic?</p> <p>3 A. Oh, yes. Certainly.</p> <p>4 Q. All right. And just because a person opposes 5 sex between an adult male and a 14-year-old boy doesn't 6 mean that they're antigay.</p> <p>7 A. I would agree with that.</p> <p>8 Q. All right.</p> <p>9 MR. SIBLEY: Ross, when you get a -- get 10 to a stopping point, let's take a quick bathroom --</p> <p>11 MR. PRINGLE, JR.: Okay. Let me finish 12 up. I'm -- I'm almost done with this e-mail.</p> <p>13 Q. (BY MR. PRINGLE, JR.) The next paragraph, it 14 says: The best way to nip in the bud any claims her 15 influential father may have is to take down all the 16 pseudo-evidence they are citing to support their 17 McCarthyite guilt-by-association argument.</p> <p>18 So, were you suggesting to David Ochsner 19 that, kind of, take down any evidence that might suggest 20 that something that would be unfavorable to you?</p> <p>21 A. I'm talking about pseudo-evidence.</p> <p>22 Q. Okay.</p> <p>23 A. And, yes, I think false claims should be nipped 24 in the bud as soon as possible. And, I believe that the 25 unit slowed down my response, and that is part of what</p>	<p style="text-align: right;">Page 49</p> <p>1 So, the fact that you've spent time with 2 pedophiles and you tell their stories and you interview 3 them and you write about them, is that some level of 4 association with pedophiles?</p> <p>5 MR. SIBLEY: Objection.</p> <p>6 Q. (BY MR. PRINGLE, JR.) In your mind?</p> <p>7 MR. SIBLEY: Objection.</p> <p>8 A. If you use the word "associate" in a 9 exceptionally broad way, virtually everyone who has met 10 anyone else associates with them.</p> <p>11 Q. (BY MR. PRINGLE, JR.) Well, you --</p> <p>12 A. I mean, I have met with people who are members 13 of the Communist party. Does that mean I am associated 14 with the Communist party? I mean, that's what John 15 McCarthy said about people on -- on similarly thin 16 grounds.</p> <p>17 Q. Don't know. I'm asking you about your 18 association with pedophiles, is a little bit more than 19 meeting with them. It's more than meeting them, isn't 20 it?</p> <p>21 MR. SIBLEY: Objection.</p> <p>22 A. I study them.</p> <p>23 Q. (BY MR. PRINGLE, JR.) You interview them?</p> <p>24 A. Yes.</p> <p>25 MR. SIBLEY: Objection.</p>

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50 to 53

<p style="text-align: right;">Page 50</p> <p>1 Q. (BY MR. PRINGLE, JR.) And you publish their 2 writings?</p> <p>3 MR. SIBLEY: Objection.</p> <p>4 A. In cases where I think that their writings give 5 us some illumination about their motives. I mean, that 6 is the only way one can really learn how to prevent 7 crime is to understand why people commit it, and that 8 means listening to their stories and even making them 9 available for other researchers.</p> <p>10 MR. PRINGLE, JR.: Objection, 11 nonresponsive.</p> <p>12 Q. (BY MR. PRINGLE, JR.) You do interview 13 pedophiles, study them, publish their writings, and, to 14 that degree, you associate with them, correct?</p> <p>15 MR. SIBLEY: Objection.</p> <p>16 A. Most of what you are calling "interviewing" 17 consists of sending them surveys to fill out, and that 18 does not involve my personally meeting them. It simply 19 involves our collecting surveys from prisoners and 20 publishing the results.</p> <p>21 Q. (BY MR. PRINGLE, JR.) What other 22 pseudo-evidence were you trying that -- to get the 23 university to bury that would -- might be detrimental to 24 you?</p> <p>25 MR. SIBLEY: Objection.</p>	<p style="text-align: right;">Page 52</p> <p>1 A. It's like now, basically, defunct organization 2 that existed in the 1980s and 1990s as a, kind of, 3 support group for people with pedophilic or pederastic 4 orientations.</p> <p>5 Q. And you're saying it's now defunct?</p> <p>6 A. It's -- basically, at present, it's just a 7 couple of people operating a website. There is no 8 organization, per se, from what I understand. And 9 again, I do not know that with epistemological 10 certainty, but I have certainly heard nothing about the 11 organization still existing and publishing anything 12 other than that website.</p> <p>13 Q. Who are the two people running the NAMBLA 14 website?</p> <p>15 A. One of them's a man named Peter Herman. The 16 other one, I don't know.</p> <p>17 Q. Herman also goes by Melzer?</p> <p>18 A. Yes.</p> <p>19 Q. And how long have you known Peter Herman, the 20 man who's running the NAMBLA website?</p> <p>21 A. About 20 years.</p> <p>22 Q. How did you meet him?</p> <p>23 A. As part of my research, I attended two meetings 24 of the group. Although I --</p> <p>25 Q. What group?</p>
<p style="text-align: right;">Page 51</p> <p>1 A. Well, in the first place, you'll need to look 2 at the wording of this very closely. I say: Any 3 pseudo -- that -- claims that her father may eventually 4 make. And the pseudo-evidence is the kind of thing in 5 and of the defendant's flyer and in Hollie Green's, you 6 know, website that, you know, would quote sentences or 7 even phrases out of context and make it appear as if 8 they meant something different from what I meant.</p> <p>9 Q. That wasn't what I wanted to ask. I was asking 10 about the pseudo-evidence that you asked the university 11 to take down to nip this in the bud.</p> <p>12 MR. SIBLEY: Objection.</p> <p>13 A. By "taking down," I mean refute.</p> <p>14 Q. (BY MR. PRINGLE, JR.) Say that again.</p> <p>15 A. By "taking down," I mean refute. I do not mean 16 they can actually, you know, censor what people put on 17 their social media. I am meaning that we should refute 18 it so thoroughly that no one will believe it.</p> <p>19 Q. Well, you -- didn't you ask Wikipedia to take 20 down the notation that you were associating with NAMBLA? 21 That's a yes or no question.</p> <p>22 A. Yes.</p> <p>23 Q. And --</p> <p>24 A. And they did.</p> <p>25 Q. And what is NAMBLA?</p>	<p style="text-align: right;">Page 53</p> <p>1 A. -- made it -- excuse me?</p> <p>2 Q. Of what group?</p> <p>3 A. NAMBLA.</p> <p>4 Q. Okay. Well, then, I'm sorry.</p> <p>5 A. And I made it clear to them that I did not 6 share in their sexual orientation, but I wanted to 7 understand it since I was working on pederasty in a 8 historical and anthropological perspective. I felt it 9 would be irresponsible not to talk to some actual 10 pederasts, because it is not my sexual orientation and 11 it's not the sexual orientation of anyone that I 12 personally knew up to that point in time.</p> <p>13 And at that point of time, NAMBLA was the 14 only organization that existed where, I thought, I could 15 meet such people and -- and talk to them and hear why 16 they still persist in -- in doing or wanting to do 17 things that are punished so severely by American law.</p> <p>18 Q. So, when you met Peter -- what's his name, 19 Melzer? What's his -- what's his other name?</p> <p>20 A. Herman.</p> <p>21 Q. Herman.</p> <p>22 Which -- which is his preferred name: 23 Herman or Melzer?</p> <p>24 A. His legal name is Melzer.</p> <p>25 Q. Melzer. Okay.</p>

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<p style="text-align: right;">Page 54</p> <p>1 Why does he use Herman?</p> <p>2 A. A lot of people who participated in that 3 organization, for obvious reasons, wanted to conceal 4 their identity.</p> <p>5 Q. What are the obvious reasons?</p> <p>6 A. That they would be accused of being sex 7 criminals or -- or pedophiles, and that's not a good 8 thing to be accused of in our society.</p> <p>9 Q. Well, why would simple membership in NAMBLA 10 lead one to believe that someone be accused of being a 11 pedophile?</p> <p>12 A. I've been accused of it just based on the fact 13 that I had -- had some minor interactions with them.</p> <p>14 Q. I'm not asking about you. And, look, are you a 15 member of NAMBLA?</p> <p>16 A. No.</p> <p>17 Q. Have you ever been a member of NAMBLA?</p> <p>18 A. No.</p> <p>19 Q. So, why would merely being a member of NAMBLA 20 open ones up to being accused of being a pedophile?</p> <p>21 A. I think it obvious.</p> <p>22 Q. State it.</p> <p>23 A. Because it is a support group for people with 24 orientations toward minors. Some of them are genuine 25 pedophiles. Some of them are, what I would call,</p>	<p style="text-align: right;">Page 56</p> <p>1 position that there should be no age of consent. And, 2 you know, I spoke against it. So, I -- I, you know, 3 think that's a serious mistake, and it's one of the 4 reasons that organization is so infamous.</p> <p>5 Q. (BY MR. PRINGLE, JR.) When was the last time 6 you spoke to Mr. Melzer?</p> <p>7 A. Few weeks ago.</p> <p>8 Q. And what was the context of your last speaking 9 to Mr. Melzer a few weeks ago? And this is the fellow 10 that maintains the NAMBLA website?</p> <p>11 A. He's involved in doing it had I -- with someone 12 else who might augment. He -- he's very interested in 13 fighting pre-crime preventative detention. Peter Melzer 14 is a Holocaust survivor. He's in his 80s. He spent 15 most of his childhood in hiding in Nazi occupied 16 Belgium. He lost his entire family to the Holocaust. 17 And I think -- and again, this is speculation on my 18 part -- part of the reason why he is attracted to 19 underage people is -- has to do with his own isolation 20 and horrible experiences during that time of hiding. 21 But he has also told me that he has never violated the 22 law, that he has been completely celibate in his entire 23 life, and I believe him.</p> <p>24 Q. What evidence do you have it's true?</p> <p>25 A. I have no evidence it is untrue, and I -- I --</p>
<p style="text-align: right;">Page 55</p> <p>1 pederasts. And one of the things I learned by meeting 2 them is that these are two very different groups of 3 people with different personalities and outlets.</p> <p>4 Q. So, NAMBLA is a support group for adults 5 sexually attracted to underage individuals, like 6 children, like teenagers, correct?</p> <p>7 A. And my understanding is it also includes some 8 underage young people or, at least, has in its history. 9 I -- I did not meet any of them at the two meetings I 10 attended.</p> <p>11 Q. And the two meetings you attended, when were 12 they?</p> <p>13 A. Late 1990s, maybe 2001.</p> <p>14 Q. And did you --</p> <p>15 A. About 20 years ago.</p> <p>16 Q. And did you present at these meetings?</p> <p>17 A. Not any formal presentation, no; but, I mean, I 18 did participate in their discussions.</p> <p>19 Q. And -- and what sort of discussions did you 20 participate in at -- at the NAMBLA support group for 21 minor attracted individuals?</p> <p>22 MR. SIBLEY: Objection.</p> <p>23 A. It's -- it's 20 years ago, so I -- I cannot 24 reconstruct this with any precision, but I know there 25 were discussions about whether they should retain their</p>	<p style="text-align: right;">Page 57</p> <p>1 I -- I -- just my personal impression of him is that he 2 is not very sexual and not likely to be attracted to an 3 underage person.</p> <p>4 Q. And how often do you speak to Mr. Melzer?</p> <p>5 A. Well, I've had a lot of e-mail exchanges with 6 him over the last couple of years, because he's very 7 interested in this issue of pre-crime preventative 8 detention or what is sometimes called civil commitment. 9 And this is also something that the foundation is 10 concerned with on human rights grounds. I mean -- I 11 mean, I -- I'm not sure if you're familiar with this 12 system. Should I explain it?</p> <p>13 Q. You shouldn't.</p> <p>14 A. Okay.</p> <p>15 Q. You would have -- other than meeting him 20 16 years ago at the conference -- or two conferences, I 17 think, right?</p> <p>18 A. Yes.</p> <p>19 Q. And were the two conferences close together?</p> <p>20 A. Maybe a couple years apart.</p> <p>21 Q. Okay. Other than that, had -- how often have 22 you seen Peter?</p> <p>23 A. A few times. I mean, there -- there was quite 24 a long period I had no contact with him.</p> <p>25 Q. All right.</p>

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<p style="text-align: right;">Page 58</p> <p>1 A. Maybe as much as 10 or 15 years. But, he is a 2 friend of Mr. Percy. And when he heard about our 3 formulating the Percy Foundation --</p> <p>4 MR. SIBLEY: Objection.</p> <p>5 A. -- to work on sexual freedom issues, including 6 the age of consent issue, which is a sexual freedom 7 issue, for adolescent boys, he -- he became interested 8 in -- in knowing more about us. And, yeah, we'd been in 9 more frequent contact since the -- since our foundation 10 formed itself.</p> <p>11 Q. (BY MR. PRINGLE, JR.) And you said that was 12 about 2013?</p> <p>13 A. That's when we incorporated. I mean, we didn't 14 really operate in any very extensive way until a couple 15 years after that.</p> <p>16 Q. All right. So, then, at least since 2015, 17 you've had fairly frequent contact with Mr. Melzer?</p> <p>18 A. Defends how you would define "frequent."</p> <p>19 Q. Well, would you disagree with that?</p> <p>20 A. A few times a year.</p> <p>21 Q. All right. And have -- have you seen him since 22 then? Since 2 --</p> <p>23 A. Yes.</p> <p>24 Q. -- 015?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 60</p> <p>1 repeal of all age of consent laws, but I'd made it clear 2 to them and clear to other people I don't agree with 3 that.</p> <p>4 Q. And was it -- is it your understanding that the 5 mission statement of -- of NAMBLA was to promote and 6 legitimize boy love?</p> <p>7 A. They would call it that.</p> <p>8 Q. What would you call it?</p> <p>9 A. And I'm not necessarily sure that they promote 10 it. They -- they seek legal reform, but their 11 publications also warn people, or at least at the time 12 that I've looked at their publications, which was back 13 at '90s, warned people very strongly against violating 14 that. I mean, it's a diff -- it's one thing to advocate 15 legal change; it's another thing to advocate or promote 16 violation of existing law.</p> <p>17 And what I found in their publications 18 were a lot of warnings about just how severe the legal 19 penalties are, of warnings against trying to access 20 child pornography. Because many of the websites that 21 presume to offer it are actually sting operations by the 22 FBI. I mean, it was actually from their publications 23 that I learned that U.S. law has extraterritorial 24 jurisdiction.</p> <p>25 Q. What does that mean?</p>
<p style="text-align: right;">Page 59</p> <p>1 Q. How many times have you seen him?</p> <p>2 A. Maybe three or four times.</p> <p>3 Q. Okay. And where have you seen him?</p> <p>4 A. In Boston. He -- he would sometimes come to 5 our meetings, and I think, at least once or twice, I 6 visited him at his home in Knockers.</p> <p>7 Q. You say "our meetings." The Percy Foundation 8 meetings --</p> <p>9 A. Yes, our board meetings.</p> <p>10 Q. Gotcha.</p> <p>11 And does Mr. Melzer have a title with 12 NAMBLA?</p> <p>13 A. I don't know.</p> <p>14 My impression is it's not really a very 15 formal organization, NAMBLA.</p> <p>16 Q. Do you know what the mission statement is of 17 NAMBLA?</p> <p>18 A. I have not looked at any of their materials 19 since I was researching them 20-odd years ago.</p> <p>20 Q. So, is the answer to that you don't know what 21 their mission statement is?</p> <p>22 A. Not their current statement. I probably 23 would've known what it was 20 years ago.</p> <p>24 Q. Do you have any idea what that was?</p> <p>25 A. My understanding was that they wanted the</p>	<p style="text-align: right;">Page 61</p> <p>1 A. That if anyone goes to a foreign country, like 2 the Philippines or Thailand -- I mean countries where 3 there is sex tourism -- and has contact with a young 4 person that may be legal in that country but is not 5 legal in the state of their residence in the U.S., that 6 is prosecutable under federal law.</p> <p>7 Q. And -- and when did you come to this 8 realization?</p> <p>9 A. In the 1990s --</p> <p>10 Q. Okay.</p> <p>11 A. -- and -- and it was only in virtue of reading 12 it in their publications. So, I think they do a service 13 to that community by warning them how dangerous this is.</p> <p>14 MR. PRINGLE, JR.: Objection.</p> <p>15 You break now in?</p> <p>16 MR. SIBLEY: Yeah, just waiting for you to 17 get to a stopping point for --</p> <p>18 MR. PRINGLE, JR.: I'd forgotten all about 19 it.</p> <p>20 MR. SIBLEY: That's okay.</p> <p>21 THE VIDEOGRAPHER: Off the record at 2:55. (Recess from 2:55 p.m. to 3:08 p.m.) (Exhibit 5 marked)</p> <p>22 THE VIDEOGRAPHER: We're back on the 23 record at 3:08.</p>

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62 to 65

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1 MR. PRINGLE, JR.: Did I give you my 2 highlighted copy?	1 A. Yes, I see that.
3 MR. SIBLEY: Yes, you did.	2 Q. And there's a citation there to a case called, 3 Melzer versus Board of Education, correct?
4 MR. PRINGLE, JR.: Yeah, sorry about that. 5 It's yours.	4 A. Yes.
6 Q. (BY MR. PRINGLE, JR.) All right. Dr. Hubbard, 7 we're looking at Exhibit No. 5, and tell me what that 8 is, please, sir.	5 Q. Is that your friend Melzer? 6 MR. SIBLEY: Objection.
9 A. This is my article from the collection we -- 10 (audio distortion/unintelligible).	7 A. It is the man that I know by that name. He 8 used to be a teacher at the New York City public school 9 system.
11 THE REPORTER: I'm sorry, I can't hear 12 you.	10 Q. (BY MR. PRINGLE, JR.) And what's that 11 litigation about, Melzer versus Board of Education? 12 MR. SIBLEY: Objection.
13 A. This is my article in the collection Greek Love 14 Reconsidered.	13 Q. (BY MR. PRINGLE, JR.) If you know?
15 Q. (BY MR. PRINGLE, JR.) And is that your 16 handwriting on the first page of Exhibit No. 5?	14 A. My understanding is that they wanted to fire 15 him, not based on any misbehavior with students but 16 simply based on his membership in this organization.
17 A. Yes.	17 Q. All right. And how long have you known that?
18 Q. Where it says "From T K Hubbard, Greek Love 19 Reconsidered, Wallace Hamilton, 2000," correct?	18 Can you just describe? Since you met him 20 years ago?
20 A. Yes.	19 A. Yes, I -- I think he did tell me then that they 20 were trying to get rid of him and had put him into, you 21 know, some kind of minor administrative position pending 22 final resolution of the case.
21 Q. Now, what is -- is there -- isn't -- is there 22 any relationship between Wallace Hamilton and NAMBLA?	23 Q. Did you offer any assistance to Mr. Melzer in 24 his lawsuit over his discharge?
23 A. I did not realize it at the time, but 24 apparently it is a subsidiary of NAMBLA. I had been 25 given the impression that it was a separate entity that	25 A. No.
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1 sometimes distributed its publications to their 2 membership. And I -- I think had I known that they were 3 actually part of NAMBLA, per se, I might've reconsidered 4 putting this volume together for you.	1 Q. The next page describes Mr. Melzer as a member 2 of NAMBLA's steering committee, correct?
5 Q. Why?	3 A. Yes, I see that.
6 A. Because of the kind of false inferences that 7 have been drawn from this by the defendant and others.	4 Q. Did you know that Mr. Melzer was a member of 5 NAMBLA's steering committee?
8 Q. Well, why do you think that would be something 9 that you -- that -- that not publishing with this 10 publishing house would address?	6 A. Yes.
11 A. Because people refer to this as something 12 published by NAMBLA and, therefore, infer from that, 13 that I support NAMBLA's positions or that this additive 14 volume supports their positions, which it does not.	7 Q. And when did you know that?
15 Q. Let me go ahead and mark, as Exhibit No. 6, a 16 document.	8 A. When I attended the first of the two meetings I 9 attended.
17 (Exhibit 6 marked)	10 Q. All right. And do you know Joseph Power?
18 Q. (BY MR. PRINGLE, JR.) And have you seen this 19 United States versus Mayer before?	11 A. I met him at the second of the two meetings.
20 A. No.	12 Q. And who is Joseph Power?
21 Q. Okay. If you'll look at page 6, it says that 22 NAMBLA functions as a support -- under -- right here, it 23 says -- page 6 -- findings of the U.S. District Judge 24 says that NAMBLA functions as a support network for its 25 estimated 2-to-300 members, correct?	13 A. He was also someone involved with the 14 organization who, I think, for a time added to their 15 board meeting.
	16 Q. And when is the last time you spoke to Joseph 17 Power?
	18 A. It was at that second meeting and never since 19 then.
	20 Q. You had zero contact with Joseph Power since 21 that second NAMBLA conference that you anticipated in 22 about 20 years ago?
	23 A. Yes.
	24 Q. Do you know that Power is a registered sex 25 offender?

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66 to 69

Page 66	Page 68
1 A. I think he admitted to that when I went.	1 else.
2 Q. And this discusses a conference where the ex --	2 Q. And you say: Our past is now something we can
3 conference of NAMBLA, I believe, in New York, where the	3 smugly congratulate ourselves from having transcended
4 attendees were told to say they were with the Wallace	4 and forgotten.
5 Hamilton Press. Did you know that?	5 A. Yes.
6 A. I did not attend that conference.	6 Q. And by "the past," we're smugly congratulating
7 Q. Did you know that Wallace Hamilton Press was	7 ourselves on the past of pre-pederasty, correct?
8 used as a cover organization for NAMBLA?	8 A. I -- I would say the past, generally, is under
9 A. I have since learned that.	9 attack on almost all issues. I mean, just look at the
10 Q. But --	10 cancellation of -- of -- of school names and statues. I
11 A. But I did not know it at the time that we	11 mean, even statues of -- of people like Lincoln and the
12 conceived the bulk contract.	12 the Founding Fathers of the country are being attacked
13 Q. And when did you learn that Wallace Hamilton	13 by people.
14 Press was a cover operation for NAMBLA?	14 American history is being described as
15 A. I think it was something in the documents that	15 being pervasively racist, and, you know, based on
16 we had from you in response to our complaint. I -- I	16 inequality. And -- and, I mean, if anything, this was
17 think you quoted something from the Curly case.	17 prescient in -- in -- in that that attack on that
18 Q. At the time of the flyer, did you know that	18 presentist attack, assuming that we're superior to ages
19 Wallace Hamilton Press was a cover organization for	19 of the past has reached even new extremes today; but it
20 NAMBLA?	20 was already starting, you know, decades ago.
21 A. No.	21 Q. So, you're questioning, then, whether we are,
22 Q. But you know that now?	22 in deed, superior to the past in the days of Greek
23 A. I do now.	23 pederasty, correct?
24 Q. Okay. And what does NAMBLA stand for?	24 A. Yes.
25 A. North American Man Boy Love Association.	25 Q. Okay. And you question whether or not we are
Page 67	Page 69
1 Q. Okay. We're through with Exhibit 6 for a	1 better than that?
2 while.	2 A. I think, for gay oriented boys, we are probably
3 I want to ask you about this sentence on	3 not as free as ancient Greece was.
4 page 2 of your -- of your article. And before I do	4 Q. By that, gay oriented boys cannot freely have
5 that, what was the purpose of your article?	5 sex with adult men, correct?
6 A. To show that pederasty's incompatible with	6 A. Yes.
7 democracy, and that is not necessarily something that	7 Q. Okay. And in that way, do you lament the
8 would be welcome to NAMBLA, but I nevertheless felt it	8 freedom that occurred in in -- in ancient Greece?
9 needed to be emphasized.	9 A. Do I lament the freedom?
10 Q. You say, on page 2, "Greed pederasty has been	10 Q. Yeah.
11 transformed into a institutional power dynamic that	11 A. I'm a Libertarian. Philosophically, I -- I
12 exploits boys no differently from women and slaves."	12 support any freedom that does not harm other people.
13 A. Yes.	13 Q. So, you -- do you support, then, the freedom of
14 Q. Is that true?	14 gay-oriented boys having sex with adult men?
15 A. Oh, yes. I think in -- in some scholarly	15 A. If it is legal for them to do so, I think it
16 writing, in the 1990s, such as the chapter of David	16 should be their choice, as it is in Germany, Italy,
17 Halperin that I quote from: Boys are analyzed to women	17 Austria, South Korea, any number of advanced countries
18 and slaves and other subaltern populations.	18 like this.
19 Q. And you say: That's no model for the	19 Q. And do you think that ages of consent in those
20 enlightened self-accepting days of late 20th Century	20 countries, that the United States should adopt those
21 late -- liberal bourgeois society.	21 lower ages of consent?
22 What do you mean that -- by that?	22 A. Yes, for boys only; not for girls.
23 A. Contemporary gay society is much more oriented	23 Q. Okay.
24 to equal relationships between men and women of equal	24 A. And this is based -- and I said it in my
25 age, of equal wealth, of equal education, everything	25 publications -- on the psychological data that show that

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<p style="text-align: right;">Page 70</p> <p>1 more boys feel they benefited from relationships with 2 adults than feel they were harmed, and that is true both 3 of heterosexual boys having affairs with women and gay 4 boys who are seeking a more experienced role model.</p> <p>5 Q. Are you aware of any studies of heterosexual 6 boys who had homosexual relations with adult men?</p> <p>7 A. Oh, yes.</p> <p>8 Q. And -- and -- and what's the study on that?</p> <p>9 A. I -- I can't cite it off the top of my head.</p> <p>10 Q. It's not the Rind study, is it?</p> <p>11 A. That may've been included. I mean, the Rind 12 study was a meta analysis. The -- reanalyzed over 20 13 previous studies, and it is certainly possible some of 14 those studies that he was basing it on did include the 15 category of straight-oriented boy who experimented with 16 sexual relationships. Many of these studies also 17 distinguished between coercive and noncoercive 18 relationships. Coercive relationships, by a very large 19 margin, had more negative outcomes.</p> <p>20 Q. Including coercive relationships, were the 21 voices yes?</p> <p>22 A. I think that's a contradiction in terms.</p> <p>23 Q. So, to your way of thinking then, adult 24 relations between an adult man and underage boy, if the 25 boy says "yes" cannot, by definition, be coercive?</p>	<p style="text-align: right;">Page 72</p> <p>1 A. What the data -- you're talking about 2 specifically heterosexual boys?</p> <p>3 Q. Heterosexual boys who are manipulated into a 4 sexual relationship by an adult male.</p> <p>5 A. Yes, if there is manipulation, such as is 6 involved in a supervisory relationship, or a 7 relationship where a boy is given drugs, which is often 8 one of the ways that, you know, child molesters will 9 procure sex from boys; but those are overwhelmingly 10 harmful.</p> <p>11 Q. Any sexual relationship between a 14-year-old 12 boy and adult male where the adult male has power over 13 the boy is inherently harmful, isn't it?</p> <p>14 A. I would agree.</p> <p>15 Q. And what situation does an adult male not have 16 power over a 14-year-old boy?</p> <p>17 A. If they are not in a supervisory position and, 18 ordinarily, some anonymous person that they met, whether 19 in a public park or through the internet, I -- I fail to 20 see how they have a power relationship.</p> <p>21 Q. So, an adult male, 25 years old, goes into a 22 restroom, finds a 14-year-old boy, didn't know him 23 before --</p> <p>24 A. Uh-huh.</p> <p>25 Q. -- convinces him to have sex, not manipulative?</p>
<p style="text-align: right;">Page 71</p> <p>1 A. They can be manipulative, but I would not use 2 the term coercive, no.</p> <p>3 Q. All right. Let's use the word "manipulative." 4 Do you have any studies of -- you know, access to any 5 studies where adult men manipulated young boys into a 6 sexual relationship?</p> <p>7 A. Yes, there have been some studies, including, 8 you know, those that we have done of -- of prisoners, at 9 the Percy Foundation, in which we asked them about their 10 childhood experiences and whether they had included 11 contact with adults and whether that contact was 12 something initiated by the adult or initiated by them, 13 whether it was coercive or whether it was mutually 14 desired. We -- we have been compiling and analyzing 15 that information based on the study of over a thousand 16 prisoners.</p> <p>17 Q. Have you ever conducted a study on a 18 14-year-old heterosexual boys to figure out how they 19 feel about it?</p> <p>20 A. Not sex --</p> <p>21 Q. Sex with an adult men?</p> <p>22 A. Not specifically.</p> <p>23 Q. Do you have any idea what their response might 24 be? Do you think it would be mutually beneficial for 25 those boys?</p>	<p style="text-align: right;">Page 73</p> <p>1 There's no power dynamic there?</p> <p>2 A. It depends how the convincing took place.</p> <p>3 Q. How do we know?</p> <p>4 A. From the testimony of -- of the boy.</p> <p>5 Q. But you've never talked to a boy, have you?</p> <p>6 A. I have certainly talked to a great number of 7 gay men who were sexually active as boys with adults.</p> <p>8 Q. And you're relying upon their memory --</p> <p>9 A. Yes.</p> <p>10 Q. -- and the filter of how they remembered things 11 when they were a little boy, don't you?</p> <p>12 A. Yes, but they -- they -- I mean, people tend to 13 have very exact memories of their first sexual 14 experience.</p> <p>15 Q. And you're also depending upon these men -- and 16 they're by and large incarcerated?</p> <p>17 A. No. I mean, when I'm talking about the -- 18 well, I mean some of those that we have examined in our 19 surveys would be incarcerated people, but quite separate 20 from that, I have a number of veins, including some of 21 the people involved with the foundation who say that, as 22 adolescent boys, they quite willingly had relationships 23 with men who were of adult age and -- and enjoyed those 24 relationships and felt that they were very helpful in 25 coming out and establishing their identity and making</p>

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<p style="text-align: right;">Page 74</p> <p>1 their way in life.</p> <p>2 Q. So, let's break that down a little bit. A lot 3 of the people that you talked to and rely upon for your 4 research are convicted felons, the prisoners?</p> <p>5 A. And that is certainly one of the strands of 6 evidence that we looked at.</p> <p>7 Q. And, of course, you rely upon their 8 creditability and their truth telling as convicted 9 felons, don't you?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. But you really can't do anything to 12 verify the accuracy of those claims, can you? Gotta let 13 it go.</p> <p>14 A. In any kind of survey, we always have to rely 15 on the credibility of the people who fill out the 16 survey. That's just inherent in -- in, you know, the 17 methodology of doing survey work.</p> <p>18 Q. And -- but you've never analyzed the effect of 19 pederastic relations between a 14-year-old heterosexual 20 boy and an adult male, have you?</p> <p>21 A. Not specifically, no.</p> <p>22 Q. Not generally either?</p> <p>23 A. We ask broader questions than that. In our 24 surveys, we ask: What was the age of your first 25 experience? We ask questions: What is your present</p>	<p style="text-align: right;">Page 76</p> <p>1 well be heterosexual.</p> <p>2 Q. My question to you, though, is, you have not 3 done any specific research on the effect of adult male 4 on underage male pederasty where the underage male is 5 heterosexual?</p> <p>6 A. It's certainly included in our broader analysis 7 of -- of the prisoner data, because most of them are 8 heterosexual and were heterosexual, and a good many of 9 them -- I mean not all of them, but a good many were 10 molested as children. I mean, we ask all kinds of 11 questions. We ask psychological profile questions. We 12 ask about the nature of their crime. We ask about the 13 age of their first experience, the age of the person 14 they had it with, whether it was incest, how they came 15 to be acquainted with that person. I mean, our -- 16 our -- our survey had 118 questions in it.</p> <p>17 Q. Okay. You say here, in Greek Love 18 Reconsidered, published by this Wallace Hamilton outfit. 19 What -- it said, "Whereas in England, the homosexual 20 move --"</p> <p>21 A. Well, what page?</p> <p>22 Q. I'm on page 4.</p> <p>23 A. Oh. Okay.</p> <p>24 Q. First full paragraph.</p> <p>25 A. Uh-huh.</p>
<p style="text-align: right;">Page 75</p> <p>1 sexual orientation? Was the first experience, in your 2 judgment, manipulative, or coercive, or was it mutually 3 embraced, or were you the one who initiated it?</p> <p>4 Q. And these are questions that you're asking of 5 convicted sex offenders?</p> <p>6 A. Not all of the people in our surveys are sex 7 offenders, but, I mean, we don't discriminate, in terms 8 of who we allow into our book program.</p> <p>9 Q. Well, not all of them are sex offenders, but 10 the vast majority are?</p> <p>11 A. I would say it's more like 60 percent.</p> <p>12 Q. All right. Sixty percent of the people in your 13 academic research are convicted sex offenders who say 14 that they had a positive experience, their first 15 experience with an adult partner?</p> <p>16 A. No, not all of them say that. Some of them say 17 it was very negative.</p> <p>18 Q. But in terms of any sort of analysis on the 19 effect of pederasty on 14-year-old heterosexual boys, 20 you've done no research on that, have you?</p> <p>21 A. Well, yes, we have, because many of the people 22 filling out our surveys are of heterosexual orientation. 23 I mean not all sex offenders are gay. The vast majority 24 of them are heterosexual, and their offenses were with 25 girls, or accessing child pornography of which might</p>	<p style="text-align: right;">Page 77</p> <p>1 Q. It says, "Whereas in England, the homosexual 2 movement was entirely -- almost entirely an intellectual 3 and literary phenomenon."</p> <p>4 What does that mean exactly?</p> <p>5 A. We're talking here about the late 19th Century 6 and the first couple of decades of the 20th Century. 7 Yes, it was, by and large, poets and artists, like Oscar 8 Wilde. They -- they called themselves The Uranians, 9 after the Uranian love that -- that is described in 10 Plato's Symposium.</p> <p>11 Q. Sir, are you saying there that in the late 19th 12 and earlieth -- early 20th Century, in England, most 13 homosexuals were intellectuals and literary?</p> <p>14 A. No, I'm not saying that, but I'm saying that 15 the people who talk about it; not the people of whom 16 there is record.</p> <p>17 Q. Okay. Let's go to page 5, which is on the 18 other side of that --</p> <p>19 A. Yeah.</p> <p>20 Q. -- last page. You talk about modern 21 scholarship on Greek pederasty is generally considered 22 to begin with Dover's Greek Homosexuality?</p> <p>23 A. Uh-huh.</p> <p>24 Q. Let me see. And, just generally, do you agree 25 or disagree with Dover's conclusions or research --</p>

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<p style="text-align: right;">Page 78</p> <p>1 A. I agree --</p> <p>2 MR. SIBLEY: Objection.</p> <p>3 A. -- with some of them; I disagree with others.</p> <p>4 Q. (BY MR. PRINGLE, JR.) All right.</p> <p>5 A. I mean, I -- I -- I've met, Sir Kenneth Dover.</p> <p>6 I've met his wife. He is very much a heterosexual, and</p> <p>7 he even says, in the preface of his book, that the</p> <p>8 framework within which he's considering these questions</p> <p>9 are the mores of the period when he grew up in the</p> <p>10 1930s, based on his experience with women.</p> <p>11 Q. You used two words: Erastés and erômenos.</p> <p>12 What do -- what does that mean?</p> <p>13 A. Oh. These are Greek words. Erastés means the</p> <p>14 lover. Erômenos is the passive participle, meaning the</p> <p>15 one who is loved.</p> <p>16 Q. What's the distinction between those two?</p> <p>17 A. The erastés is generally, although not always,</p> <p>18 older. And the one who is loved is -- is younger. But,</p> <p>19 it -- I mean, one of the thrusts of my scholarship --</p> <p>20 and I think one of the principal original contributions</p> <p>21 I have made -- is to show that age equal homosexuality,</p> <p>22 particularly among young men who are not yet at the age</p> <p>23 of marriage, was quite common in Greece. And again,</p> <p>24 that's not necessarily something that -- that</p> <p>25 pedophiles, as we call them, would want to hear.</p>	<p style="text-align: right;">Page 80</p> <p>1 such terms at the end of a decade that discovered</p> <p>2 child -- quote, child abuse, closed quote, as a</p> <p>3 supposedly pervasive phenomenon in American society.</p> <p>4 What do you mean by that?</p> <p>5 A. We're -- I mean, we're -- we're referring here</p> <p>6 to people, like Halperin and David Zinn writing in the</p> <p>7 1990s, and the decade that preceded that were the 1980s,</p> <p>8 which were a time of extreme moral panic. This is when</p> <p>9 we got things like the day care abuse scandals, like the</p> <p>10 McMartin Preschool. It's when we had all of these</p> <p>11 sensationalist media accounts of ritualized satanic</p> <p>12 abuse, you know, that all the prominent citizens of --</p> <p>13 of some small town, including the preachers and the</p> <p>14 judges and the doctors, were all part of some conspiracy</p> <p>15 to abuse children. It's -- it's the decade in which we</p> <p>16 had charges of parents molesting their own children.</p> <p>17 I mean, I can recognize at the University</p> <p>18 of Minnesota is when the famous witch hunt of Jordan</p> <p>19 County, Minnesota occurred, in which an out-of-control</p> <p>20 district attorney manipulated children to denounce their</p> <p>21 parents for having molested them. And then later on</p> <p>22 when the kids became adult, they admitted that none of</p> <p>23 this ever happened. And almost all of those infamous</p> <p>24 sensational media cases of the '80s have since been</p> <p>25 debunked.</p>
<p style="text-align: right;">Page 79</p> <p>1 Q. Am I correct -- and I've read some of your</p> <p>2 writings -- that the erastés is the penetrating partner</p> <p>3 and erômenos is the receiving partner?</p> <p>4 A. That is what is assumed by David Halperin and</p> <p>5 others, but --</p> <p>6 Q. Not you?</p> <p>7 A. Not necessarily. I mean, we -- honestly, we</p> <p>8 don't know what people actually did. It's -- it</p> <p>9 generally inferred from the Voss painting that, yes,</p> <p>10 the -- the older one is the one who penetrates, but the</p> <p>11 penetration we're talking about is interfemoral, not --</p> <p>12 Q. What does that mean?</p> <p>13 A. Between the thighs.</p> <p>14 It is not penetration of the anus or the</p> <p>15 mouth. That is almost never represented between an</p> <p>16 adult and a boy. Anal penetration is represented in</p> <p>17 some representations of two age equal partners, whether</p> <p>18 adult or a female.</p> <p>19 Q. Moving on. You say here -- and I -- I'm</p> <p>20 reading from this portion of that paragraph right here.</p> <p>21 A. Uh-huh.</p> <p>22 Q. It's somewhere in there.</p> <p>23 A. Uh-huh.</p> <p>24 Q. It says, "It should not surprise us to find an</p> <p>25 American academic choosing to read Greek pederasty in</p>	<p style="text-align: right;">Page 81</p> <p>1 I mean, here, in Texas, we have the famous</p> <p>2 case of the San Antonio four. Those four lesbians</p> <p>3 who -- who were accused of molesting their own children.</p> <p>4 In addition, in -- in the late 1970s, we had Anita</p> <p>5 Bryant and her Save Our Children campaign that, you</p> <p>6 know, resisted gay rights, generally, with the</p> <p>7 contention that -- that almost all gays are pedophiles.</p> <p>8 That the late '70s are when we had Senator</p> <p>9 John Briggs ballot initiative in California, that any</p> <p>10 teacher who was openly gay or even any teacher who</p> <p>11 advocated gay rights would have to be fired. And in</p> <p>12 large part due to the opposition of Ronald Reagan, that</p> <p>13 initiative fortunately failed.</p> <p>14 Q. You don't disagree that child abuse -- well,</p> <p>15 maybe you do. Is child abuse a pervasive phenomenon in</p> <p>16 American society?</p> <p>17 A. The actual social science data on that is</p> <p>18 that -- if we're talking about child sexual abuse, that</p> <p>19 it probably occurs in -- that it's actually quite rare,</p> <p>20 and it depends how you define child sexual abuse. I do</p> <p>21 not define it as abuse if it is something that the young</p> <p>22 person does consensually and -- and with a partner who</p> <p>23 is not in any way manipulating them or offering them</p> <p>24 special rewards for it.</p> <p>25 Q. Regardless of the ages involved?</p>

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<p style="text-align: right;">Page 82</p> <p>1 A. Well, I do think it should be termed child 2 abuse if it is under the age of puberty. 3 Q. Which is what? 4 A. Fourteen for males, 13 for females; although, 5 actually, the biological evidence has been showing that 6 it has been steady declining. 7 Q. So, as long as the 14-year-old boy consents to 8 sexual -- sexual result -- sexual conduct with an -- an 9 adult, you don't think that's child abuse? 10 A. And as long as there is no relationship of 11 supervision or manipulation. 12 Q. Okay. You say -- 13 A. I would call it intergenerational, but not 14 abusive. 15 Q. Would you call it inappropriate? I think you 16 said that earlier. 17 A. Inappropriate where it is illegal. 18 Q. Okay. 19 "Halperin strongly negative portrayal of 20 Greek pederasty coincided with a systematic strategy of 21 mainline assimilationist gay rights organization to 22 marginalize consideration of youth sexuality or reform 23 an age-of-consent laws." 24 A. Yes. 25 Q. So, you think that the -- the mainline gay</p>	<p style="text-align: right;">Page 84</p> <p>1 Q. You're not -- are you a social scientist? 2 A. No, but my foundation does a great deal of work 3 with social sciences. 4 Q. All right. 5 A. And I would also say Ann is a historian. 6 History is very social scientific. It -- in fact, the 7 liberal arts, generally, are very interdisciplinary, and 8 I -- I have read a great deal of the psychological and 9 sociological and anthropological literature on this 10 specific question, because particularly when you're 11 talking about social history, which is what sex history 12 is, social science methods are very relevant. 13 Q. And you point out that pederasty in Ancient 14 Rome or Ancient Greece, I should say, also fell out of 15 favor Athens, correct? 16 A. Yes, as Athens became more democratic. 17 Q. Okay. 18 A. And this is part of the argument that pederasty 19 fundamentally doesn't fit into democratic society, 20 including our democratic society. I mean, this is not 21 necessarily a message that would be welcomed in NAMBLA. 22 Q. Well, you do say that traditional man/boy love 23 was put on the defensive. 24 A. Yes. 25 Q. All right. And you point out, on page 8, a</p>
<p style="text-align: right;">Page 83</p> <p>1 rights organization GLAD and the other that you 2 mentioned are trying to mainline and assimilate gay 3 rights? 4 A. Oh, yes, very much so. 5 Q. Okay. And -- and as opposed to that, what's -- 6 what's the counterpart to that, that it's 7 assimilationist? 8 A. The origins of the gay rights movement, in the 9 late '60s and 1970s, were based on offering a radical 10 alternative to mainline middle class respectable family 11 life and offering an alternative to the nuclear family. 12 And although I certainly do not support doing away with 13 the nuclear family, like Black Lives Matter does, I -- I 14 do think that people who don't want to be in that kind 15 of family should have that alternative.</p> <p>16 Q. And do you think that that assimilationist 17 presents to the public this unthreatening plain vanilla 18 image of gays and lesbians as dull, middle age with 19 middle class bland canil -- careers and marriages just 20 like everybody else?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And you -- and -- and your position is, 23 we should consider the youth sexuality and what the 24 youth wants?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 85</p> <p>1 pederastic relationship which gave ride -- gave rise to 2 the boy's suicide? 3 A. Oh, yes. That's the myth of Laius and 4 Chrysippus, which I subsequently wrote a much longer 5 scholarly article about. 6 Q. Okay. So, you would agree, then, that sexual 7 relations between men and boys can have a downside? 8 A. Oh, certainly. But in the myth of Laius and 9 Chrysippus, we're talking about rape, that the boy 10 strongly resisted. And, you know, according to 11 Euripides' version of the myth, the -- the -- the boy 12 did -- was so ashamed of what happened, that he 13 committed suicide. 14 And I would mention that the man who 15 committed the rape, the future King Laius, was the 16 father of Oedipus. And if you know the Oedipus story, 17 you know that Laius got punished rather severely for his 18 sexual incontinence. 19 Q. Why would the boy be ashamed? 20 A. Rape victims often feel shame, and -- and 21 particularly a male rape victim. I -- I -- I would say 22 that male rape victims -- and there is social science 23 behind this -- are more reluctant to report it and are 24 less likely to be believed than female rape victims. 25 Q. And you know why that is?</p>

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<p style="text-align: right;">Page 86</p> <p>1 A. Because it conflicts with their sense of 2 masculinity. I mean, men are supposed to be strong and 3 assertive, and the idea of a man being sexually violated 4 by another man is -- is appalling to them.</p> <p>5 Q. Even if the young man gives consent?</p> <p>6 A. Well, consent and violation do not go together. 7 I define violation as forcible rape.</p> <p>8 Q. You wouldn't define violation as an older man 9 persuading a younger man to have sex, would you?</p> <p>10 MR. SIBLEY: Objection.</p> <p>11 A. It -- it depends on the details of the case and 12 just what the persuasion consisted of.</p> <p>13 Q. (BY MR. PRINGLE, JR.) And on page 10, you talk 14 about Socrates?</p> <p>15 A. Yes.</p> <p>16 Q. You say, Socrate -- later, in the Symposium, 17 Socrates presents physical attraction to a beautiful 18 object, such as a boy, as merely the first and lowest 19 step in a ladder of erotic relations.</p> <p>20 A. Yes.</p> <p>21 Q. So, Socrates suggests that attraction to a boy 22 is the first and lowest step in a ladder of erotic 23 relations?</p> <p>24 A. Yes. It's -- it's called the "Ladder of Love," 25 because he uses the "ladder" metaphor. And the primary</p>	<p style="text-align: right;">Page 88</p> <p>1 really needs to be contextualized, not as the opinion of 2 the historical Socrates but Plato's -- things that Plato 3 attributes to Socrates.</p> <p>4 Q. But Socrates doesn't present physical 5 attraction to a boy as the first and lowest step in a 6 ladder of erotic relations, does he?</p> <p>7 A. Yes --</p> <p>8 Q. He does?</p> <p>9 A. -- he does. Yeah, at least as articulated 10 within Plato's Symposium.</p> <p>11 Q. Huh.</p> <p>12 A. Read it.</p> <p>13 Q. I have.</p> <p>14 A. Read it again.</p> <p>15 Q. I just maybe come to a different conclusion.</p> <p>16 So, any pederastic tradition, then, 17 continues in Plato who drops all pretense of defending 18 pederasty as chase love and dismisses it as unnecessary 19 and unnatural, correct?</p> <p>20 A. Plato was generally hostile to all physical 21 relations for any purpose other than reproduction. I 22 mean, Plato, and much of Greek philosophy, is very 23 distrustful of appetites and emotions.</p> <p>24 Q. You go on to say that pederasty -- and that's 25 the last sentence in that paragraph.</p>
<p style="text-align: right;">Page 87</p> <p>1 romantic form of love and sex in Ancient Greece was 2 pederasty. Heterosexual marriages were by and large 3 arranged marriages that were economic relationships 4 between family. So -- so they -- they had relatively 5 little to do with erotic attraction.</p> <p>6 And, you know, consensual pederasty, well, 7 was considered to be more accept -- well, more 8 respective of mutuality than, say, a relationship with a 9 prostitute or a slave.</p> <p>10 Q. You're not saying that Socrates endorsed sexual 11 relations between adults and boys, are you?</p> <p>12 A. No, he did not. In fact, in Xenophon 13 Symposium, we -- we have him trying to dissuade the 14 young men, under his influence, from having physical 15 relationships with boys. He saw nothing wrong with 16 close friendships.</p> <p>17 But, you see, Socrates generally 18 considered physical love to be the lowest step. 19 Superior -- in fact, he -- he said that obsession with 20 one boy is the lowest step. Attraction to multiple boys 21 of good character is the second step. Beautiful 22 teaching or beautiful works of art would be the third 23 step in -- in -- in one's erotic appreciation of 24 beauty -- or beau -- or -- or, you know, law giving or 25 other things that were socially productive. And this</p>	<p style="text-align: right;">Page 89</p> <p>1 Pederasty is an institution -- that's 2 fundamentally foreign to Athens radicalized democracy 3 but associated with a more disciplined and arguably 4 better governed societies elsewhere.</p> <p>5 A. Okay. That's in the context of Plato's laws --</p> <p>6 Q. Okay.</p> <p>7 A. -- which were a late work that --</p> <p>8 Q. That's not your opinion then?</p> <p>9 A. Oh, no. No. No. No.</p> <p>10 Q. Okay.</p> <p>11 A. We're talking here about of Plato's view and -- 12 and -- well, and the view of Ancient Greeks.</p> <p>13 Q. You say, "Plato and other fourth century 14 intellectuals unwittingly promoted a conceptual matrix 15 in which all physical love of boys --"</p> <p>16 A. Oh. Let me -- what paragraph?</p> <p>17 Q. I'm at the bottom of page 10.</p> <p>18 A. Uh-huh. Okay. I see it.</p> <p>19 Q. "Plato and other fourth Century intellectuals 20 unwittingly promoted a conceptual matrix."</p> <p>21 What does that mean? I don't know what 22 "conceptual matrix" is.</p> <p>23 A. You know what a concept is?</p> <p>24 Q. Don't know --</p> <p>25 A. Do you know what a matrix is?</p>

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<p>1 Q. I don't know what a conceptual matrix is.</p> <p>2 Educate me.</p> <p>3 A. An array of concepts that relate to each other.</p> <p>4 Q. Okay.</p> <p>5 "More to conceptual matrix in which all</p> <p>6 physical love of boys came to be only physical love."</p> <p>7 What does that mean?</p> <p>8 A. In which this would be considered dichotomists</p> <p>9 were separated from love of character or other -- other</p> <p>10 forms of love. I mean, again, Plato was very</p> <p>11 distrustful of appetites and sensations.</p> <p>12 Q. So, "all physical love of boys came to be only</p> <p>13 physical love"; what does that mean?</p> <p>14 A. That it would -- that -- that he believed it as</p> <p>15 something that was not necessary to have a love</p> <p>16 relationship that was based on character and mutual</p> <p>17 devotion.</p> <p>18 Q. The next --</p> <p>19 A. In other words, that -- that, to his concept,</p> <p>20 sex was just sex and -- and, you know, shouldn't be</p> <p>21 confused with other things.</p> <p>22 Q. "Similarly, the man/boy love that was</p> <p>23 acknowledged and even celebrated by early homosexual</p> <p>24 activists has been marginalized within our own</p> <p>25 progressively democratic and homogenized susta --</p>	<p>1 "perverts" and "child molesters" in quotes?</p> <p>2 A. Because I don't think that all relationships</p> <p>3 between a young man and a adolescent are necessarily</p> <p>4 perversion and molestation as the evidence, you know,</p> <p>5 shows from those countries or sex relations are --</p> <p>6 are -- are legal and -- and seen to be un --</p> <p>7 unproblematic, you know, such as Germany and some of the</p> <p>8 other countries that we mentioned. In fact, what the</p> <p>9 social science evidence shows is that adolescent mental</p> <p>10 health is actually better in those times.</p> <p>11 Q. So, the man/boy love that was acknowledged and</p> <p>12 celebrated by earlier homosexual activists, you would</p> <p>13 agree, is sometime the province of perverts and child</p> <p>14 molesters?</p> <p>15 A. Oh, yes. I mean, there are certainly some men</p> <p>16 who do take advantage and manipulate or even coerced</p> <p>17 their -- and, yes, that -- that, I think, is quite</p> <p>18 properly legally punished.</p> <p>19 Q. And then you criticize the squeamishness and</p> <p>20 timidity of gay intellectuals that made them tacit</p> <p>21 collaborators in this myth that man/boy love is isolated</p> <p>22 as the province of perverts?</p> <p>23 A. I don't think I used the word "myth," do I?</p> <p>24 Q. No.</p> <p>25 A. You're inferring that. No, I don't use that.</p>
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<p>1 society."</p> <p>2 Is that a negative critique?</p> <p>3 "Isolated as a province of pervert in</p> <p>4 child molesters."</p> <p>5 A. Plato uses a statement that, relative to the</p> <p>6 origins of the gay rights movement in late 19th and</p> <p>7 early 20th Century Germany and England, where -- where</p> <p>8 pederasty was very much identified as the dominant form.</p> <p>9 In -- in modern gay discourse, it is marginalized.</p> <p>10 It's -- it's -- it's not what they want to talk about.</p> <p>11 And -- and, no, I'm -- no, I think, saying that it's all</p> <p>12 the work of perverts and child molesters is a -- an</p> <p>13 exaggerated -- uh-huh. But that does not mean that I'm</p> <p>14 necessarily advocating it or promoting it in modern</p> <p>15 society as the defendant alleged.</p> <p>16 Q. You just say that the man-boy love that was</p> <p>17 celebrated by earlier activists has been marginalized</p> <p>18 with our own progressively democratic and homogenized</p> <p>19 society. So, sex between an adult man and a young boy</p> <p>20 has been marginalized, meaning that it's put on the</p> <p>21 margin, it's taken out of the mainstream --</p> <p>22 A. Right.</p> <p>23 Q. -- and it's been isolated as the providence of</p> <p>24 pervert -- quote, perverts and child molesters.</p> <p>25 What do you mean? Why did you put</p>	<p>1 Q. It's --</p> <p>2 A. You're calling --</p> <p>3 Q. -- epistemological.</p> <p>4 A. Excuse me?</p> <p>5 Q. Nothing.</p> <p>6 So, you criticize the squeamishness and</p> <p>7 timidity of gay intellectuals that made them tacit</p> <p>8 collaborators in this marginalization pederasty?</p> <p>9 A. Yes, I think that has been proved, starting in</p> <p>10 the 1980s, at the time of the child abuse panic --</p> <p>11 Q. And --</p> <p>12 A. -- that we discussed.</p> <p>13 Q. -- and gays today have sold out the real</p> <p>14 pederasts by pretending that there can be a nonsexual</p> <p>15 pederasty between adult man and young boy, true?</p> <p>16 A. I'm talking about Plato --</p> <p>17 Q. Yeah.</p> <p>18 A. -- at this time.</p> <p>19 Q. No, you're talking about squeamishness and</p> <p>20 timidity of gay intellectuals in the face of public</p> <p>21 hostility. That's right now, aren't you?</p> <p>22 A. And also in Plato's time.</p> <p>23 Q. Okay. Sure. Made them tacit collaborators.</p> <p>24 Even as Plato's and others sold out the real pederasts,</p> <p>25 gay leaders today sell out their brothers by creating</p>

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<p style="text-align: right;">Page 94</p> <p>1 the public fiction that most guys are involved in 2 long-term monogamous and age and class relationships.</p> <p>3 A. Yes.</p> <p>4 Q. That's not true, is it? Most gays are not 5 involved in long-term monogamous age and classical 6 relationships?</p> <p>7 A. Yes, that is what the evidence shows is that -- 8 that is untrue, but I think a lot of those mainstream 9 gay rights organizations who focus on gay marriage, and 10 gay adoption, and -- and, you know, professional 11 advancement of -- of, you know, gays in -- in 12 professions, you know, are -- are really not looking at 13 the issues of how the criminal justice system, you know, 14 treats less fortunate gay men.</p> <p>15 Q. And you also attack the fiction that the only 16 men attracted to teenage boys are a few sickos in 17 NAMBLA.</p> <p>18 A. Yes.</p> <p>19 Q. Are you -- are you telling me that most gay men 20 are attracted to teenage boys?</p> <p>21 A. No, just that -- that those who are, are not 22 necessarily sick or involved with organizations like 23 NAMBLA. I mean, again, this is a statement that -- that 24 would not necessarily be welcomed to NAMBLA.</p> <p>25 Q. I didn't ask about that though. I'm just</p>	<p style="text-align: right;">Page 96</p> <p>1 Raphael without going out and trying to seduce underage 2 people.</p> <p>3 Q. We're done with that one.</p> <p>4 A. Okay. You want to ask about another article?</p> <p>5 Q. I don't.</p> <p>6 A. Okay.</p> <p>7 Q. Let's see here. This is gonna be number . . . 8 THE REPORTER: Seven. Seven.</p> <p>9 Q. (BY MR. PRINGLE, JR.) Seven. (Exhibit 7 marked)</p> <p>10 Q. (BY MR. PRINGLE, JR.) This is: Sexual Consent 11 and the Adolescent Male, or What We Can Learn from the 12 Greeks.</p> <p>13 A. Yes.</p> <p>14 Q. And you wrote this when, 2010?</p> <p>15 A. Well, I would've written it a year or two 16 earlier, but it was published in 2010. I mean, there's 17 a lag time in publication -- in scholarly publication.</p> <p>18 Q. All right. So, you talk about -- on page -- 19 well, the first page doesn't have any page numbers on 20 the bottom, but I'm talking about the page on the right, 21 on the first page.</p> <p>22 A. In other words, the second page of the article?</p> <p>23 Q. In other words, the second page of the article.</p> <p>24 A. Okay.</p>
<p style="text-align: right;">Page 95</p> <p>1 asking you -- are -- are you saying that in addition to 2 the few sickos in NAMBLA --</p> <p>3 A. Uh-huh.</p> <p>4 Q. -- obviously, lots of people in NAMBLA would be 5 attracted to teenage boys, true?</p> <p>6 A. And some of them would be genuine pedophiles.</p> <p>7 Q. Right. But what you're saying, that there's a 8 lot more gay people that are attracted to teenage boys 9 besides those sickos in NAMBLA?</p> <p>10 A. Sure. I think most average gay men can find an 11 attraction to teenage boys, but most of them don't act 12 on it, just as most heterosexual men find teenage girls 13 attractive, but they have enough self control and self 14 discipline that they don't violate the law.</p> <p>15 Q. Do you have any concern that what you just said 16 perpetuates this myth that sex between adult men and 17 underage boys is a province of most gay men?</p> <p>18 A. No more so nor less so than a heterosexual men 19 in regard to teenage girls.</p> <p>20 Q. So, to that extent then, you would agree with 21 that, correct?</p> <p>22 A. An appreciation of beauty does not necessarily 23 equate with seeking a sexual relationship with someone.</p> <p>24 Most of us have self control. I can appreciate the 25 beauty of a painting by Karachi, or Michael Angelo, or</p>	<p style="text-align: right;">Page 97</p> <p>1 Q. "As I have documented elsewhere (Hubbard, 2 1998) -- and what is that publication?</p> <p>3 A. That was the one in Orion that was titled, 4 "Popular Perceptions of Elite Pederasty --"</p> <p>5 Q. Gotcha.</p> <p>6 A. "-- in Classical Athens."</p> <p>7 Q. Now you say that Athenian pederasty was 8 primarily an upper-class insti -- institution between 9 youths of good family and education between the ages of 10 puberty and full beard-growth, between about 14 and 21, 11 correct?</p> <p>12 A. Yes.</p> <p>13 Q. And you argued that the lover -- the -- the 14 older partner --</p> <p>15 A. Yes.</p> <p>16 Q. -- could act as a surrogate father figure for 17 an adolescent boy.</p> <p>18 A. Yes, because Greeks did not marry -- Greek men 19 did not marry until they were in their 30s, then, of 20 course, the average mortality was at a much younger age, 21 particularly in times of war or plague, like late Fifth 22 Century Athens.</p> <p>23 Q. On -- on pay -- on the next page, page 128, you 24 say: In some cases, pederastic love might become an 25 instrument of social mobility?</p>

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<p>1 A. Yes.</p> <p>2 Q. Meaning that a young boy -- talented and 3 attractive young boy of a -- of a certain age could 4 progress socially because of the pederastic liaison with 5 an older man?</p> <p>6 A. Yes, he -- he would be invited to symposia and 7 parties where he would meet other members of the social 8 elite.</p> <p>9 Q. Does that still happen today, you know?</p> <p>10 A. I don't really think so. I mean -- but, you 11 know, we -- we do have episodes, like that 16-year-old 12 boy who went to a party of gay men, including Kevin 13 Spacey, and said he was then raped by Kevin Spacey. I 14 mean, what I wonder about is why was the boy at that 15 party to begin with? But I -- I think that's relatively 16 uncommon now.</p> <p>17 Q. You talk about one of Aristotle's pupils?</p> <p>18 A. Yes. The problems are -- are generally assumed 19 not to be by Aristotle himself, but by later members of 20 the Peripatetic school.</p> <p>21 Q. And what do Aristotle's pupils tell us?</p> <p>22 A. Well -- okay. Clearly tells us that the reason 23 some grown men like to be anally penetrated is that it 24 erects pleasant memories of having enjoyed it so much as 25 a pubescent boy. Yes, I -- I give that passage in the</p>	<p>1 when filling out surveys much later --</p> <p>2 Q. About --</p> <p>3 A. -- sounds --</p> <p>4 Q. -- their prison?</p> <p>5 A. Not just from those. A lot of the surveys were 6 surveys of students in psychology classes. I mean, 7 that -- that's where psychologists get a lot of the 8 data, and what -- what those surveys intended to show is 9 that the form of sex doesn't really matter.</p> <p>10 There are only two things that are really 11 statistically significant, in terms of determining 12 whether someone has a pleasant memory or an unpleasant 13 memory. The first thing is whether it was coercive or 14 noncoercive, and the second thing is whether we're 15 talking about a girl or a boy. Boys are far more likely 16 to react well to adolescent sexual experiences than 17 girls are, which is one of the reasons I propose -- 18 or -- or, at least, throw out the idea that we might 19 consider a different age of consent for the two sexes.</p> <p>20 Q. We'll get to that.</p> <p>21 My question to you, though, was -- you 22 said: This wouldn't be true today, that the reason some 23 grown men like to be annually penetrated is that it 24 wakes pleasant memories of having enjoyed it so much as 25 a pubescent boy. Why is that not true today?</p>
<p>1 book that I sent you.</p> <p>2 Q. And so part of your scholarship is, is to 3 explain, back in Greece, that one of the reason that 4 some grown men like to be anally penetrated is that it 5 awake -- awoke pleasant memories of being anally 6 penetrated --</p> <p>7 A. That -- that's --</p> <p>8 Q. -- as a pubescent boy?</p> <p>9 A. -- that's what that text says. It's not what I 10 say. And to be sure, the -- the Peripatetic 11 understanding of biology is not accurate in my modern 12 medical opinion. So, no, I don't agree with it, but 13 it's what the text said.</p> <p>14 Q. You don't have a position on that?</p> <p>15 A. About whether that's true today?</p> <p>16 Q. Yeah, a reason that some grown men like to be 17 anally penetrated is -- is that it awakes pleasant 18 memories of having enjoyed it so much as a pubescent 19 boy.</p> <p>20 A. I think it would be rather unusual today.</p> <p>21 Q. Why?</p> <p>22 A. It's only a minority of -- of relationships 23 of -- of age differential relationships where anal sex 24 is even at issue. And what the psychological evidence 25 shows is that whether boys retrospectively -- I mean,</p>	<p>1 A. Well, it might be true of some of them. I 2 mean, those who are specifically gay oriented often look 3 back on their adolescent sexual experiences as very 4 formative in coming out with their identity.</p> <p>5 And, I mean, there was one study that was 6 published in the "Archives of Sexual Behavior," I think, 7 around 2001, that -- that specifically looked at the 8 reactions of gay boys. There's the -- there are the 9 books of Rich Savin-Williams at Cornell who -- who deals 10 with gay adolescents. And, I think, what this showed 11 was that about 77 percent of them, of those who had had 12 adolescent experiences with men above the age of 13 consent, evaluated it as a positive experience as 14 opposed to only about 12 percent who said it was 15 negative and -- and then a certain amount who said it 16 was equally balanced, that there were good aspects, bad 17 aspects.</p> <p>18 Q. Do you think that some grown men may've -- may 19 have unpleasant memories of having been anally 20 penetrated as a pubescent boy by an adult male?</p> <p>21 A. Certainly.</p> <p>22 Q. And you think that heterosexual boys would 23 enjoy that?</p> <p>24 A. No, hetero -- boys who are not gay or bisexual 25 are more likely to find it a negative experience, but</p>

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<p style="text-align: right;">Page 102</p> <p>1 not even all of them did.</p> <p>2 Q. Okay. You mentioned the study -- that the</p> <p>3 77 percent?</p> <p>4 A. Uh-huh.</p> <p>5 Q. So, 77 percent of boys who identify as gay or</p> <p>6 bisexual --</p> <p>7 A. Uh-huh.</p> <p>8 Q. -- who had sexual experiences before the age of</p> <p>9 consent rated to be a positive experience?</p> <p>10 A. We're talking about specifically sexual</p> <p>11 relations with someone above the age of consent when</p> <p>12 they were below the age of consent --</p> <p>13 Q. Right.</p> <p>14 A. -- and -- and, you know, that this was based on</p> <p>15 Rich Savin-Williams.</p> <p>16 Q. But the sample is completely silent as to</p> <p>17 heterosexual boys, not gay or bisexual boys, but</p> <p>18 heterosexual boys who had a sexual relations --</p> <p>19 relationship with an adult male over the age of consent.</p> <p>20 A. That -- that is not the population that</p> <p>21 Savin-Williams was doing research on.</p> <p>22 Q. Or that you had done research on?</p> <p>23 A. Well, except to the extent that our prison</p> <p>24 survey of, you know, a thousand-odd people, you know,</p> <p>25 had large numbers of heterosexual respondents, some of</p>	<p style="text-align: right;">Page 104</p> <p>1 Lysias' treatise instead" -- but read that if you would.</p> <p>2 A. "Lysias' treatise instead advises sexual</p> <p>3 intimacy with someone who is not so passionate, but</p> <p>4 takes for granted that sex with boys is a good thing."</p> <p>5 Q. And then you cite your own writing?</p> <p>6 A. The first citation is to my sourcebook, and</p> <p>7 that is simply giving the text of Plato's "Phaedrus,"</p> <p>8 and -- and the particular passage in the "Phaedrus"</p> <p>9 where Lysias says that.</p> <p>10 Q. Do you think somebody could read this passage</p> <p>11 and come away with the impression that sex with the boys</p> <p>12 is a good thing?</p> <p>13 A. In my opinion? No, I'm -- I'm citing Lysias</p> <p>14 here. I'm making it very clear I'm talking about an</p> <p>15 Ancient author.</p> <p>16 Q. What's canard?</p> <p>17 A. A -- a general opinion that's false.</p> <p>18 Q. All right. So, you think it's a false opinion</p> <p>19 that all adults always have more power in a relationship</p> <p>20 with someone younger?</p> <p>21 A. Yes, I do.</p> <p>22 Q. You think sometime the boy has all the power?</p> <p>23 A. Well, certainly in -- in present day society</p> <p>24 they do, because the boy can put the adult in prison by,</p> <p>25 you know, talking about it to his parents or the police</p>
<p style="text-align: right;">Page 103</p> <p>1 whom had sexual experiences with adult men, some of whom</p> <p>2 had sexual experiences with adult women, some of whom</p> <p>3 had no experiences underage, some of whom had abusive</p> <p>4 experiences or experiences that they considered abusive,</p> <p>5 some of whom had experiences that they considered</p> <p>6 consensual. I mean, we're -- we're looking at all those</p> <p>7 correlations.</p> <p>8 Q. But in terms of specifically studying that</p> <p>9 population of heterosexual boys who have been anally</p> <p>10 penetrated by an adult male when they're underage, any</p> <p>11 studies on that, that you're aware of?</p> <p>12 A. Not that focuses only on that, but that is part</p> <p>13 of what we are analyzing, is what is the difference</p> <p>14 between those who are gay or bisexual in their</p> <p>15 identification and those who are heterosexual. And --</p> <p>16 and what we have found, and this is confirmed by other</p> <p>17 studies, is that those who are heterosexual in their</p> <p>18 orientation tend to be more negative about early</p> <p>19 homosexual experiences that they had, although even they</p> <p>20 are not uniformly so.</p> <p>21 Q. Let's go to page 130.</p> <p>22 A. Uh-huh.</p> <p>23 Q. On -- there's this full paragraph there that</p> <p>24 says -- and I'm -- I'm gonna read the sentence. See</p> <p>25 that sentence? It begins: "Ly -- Lysias -- Lysias's --</p>	<p style="text-align: right;">Page 105</p> <p>1 or whatever. So, yes, in -- in current society, they</p> <p>2 do.</p> <p>3 Q. Well, you wouldn't think that a boy would use</p> <p>4 that power to entice someone into having sex with them,</p> <p>5 would you?</p> <p>6 A. Well, there have been cases of blackmail that</p> <p>7 have been -- have occurred.</p> <p>8 Q. Do you think the boy goes and says: Hey, I can</p> <p>9 put you in prison if you have sex with me. I got that</p> <p>10 power over you, let's have some sex. Is that what</p> <p>11 you're saying?</p> <p>12 A. I once heard a man who had gotten involved with</p> <p>13 Big Brother's, tell me that the youngster that he was</p> <p>14 paired with had said something to that effect to him,</p> <p>15 and after that he just wanted nothing more to do with</p> <p>16 him or with the Big Brother's program.</p> <p>17 THE REPORTER: Or with the what, I'm</p> <p>18 sorry? Or with the --</p> <p>19 MR. PRINGLE, JR.: The Big Brother's</p> <p>20 program.</p> <p>21 Q. (BY MR. PRINGLE, JR.) That's not the canard</p> <p>22 you're talking about though, is it?</p> <p>23 A. No.</p> <p>24 Q. You're saying that it -- that boys often have</p> <p>25 more power in a sexual relationship with an adult male</p>

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<p style="text-align: right;">Page 106</p> <p>1 because the boy is youthful and beautiful --</p> <p>2 A. Yes.</p> <p>3 Q. -- and that -- and that's what the adult sees?</p> <p>4 A. Yes, it's --</p> <p>5 Q. And --</p> <p>6 A. -- what many adults see.</p> <p>7 Q. And the boy can hold that youth and pow --</p> <p>8 youth and beauty as power to manipulate the older -- the</p> <p>9 older adult, correct?</p> <p>10 A. There are many Greek texts that confirm that.</p> <p>11 And, again, this sentence is talking about the Greeks.</p> <p>12 Q. But you also say that's present in the -- in</p> <p>13 the current world, isn't it, that boys have that</p> <p>14 manipulative power over older men? You don't say it</p> <p>15 here, but you say it, don't you?</p> <p>16 MR. SIBLEY: Objection.</p> <p>17 A. You -- you'd have to show me the exact place</p> <p>18 where I say --</p> <p>19 Q. (BY MR. PRINGLE, JR.) Well --</p> <p>20 A. -- this.</p> <p>21 Q. -- I'm asking you, do you believe that to be</p> <p>22 the case?</p> <p>23 A. That boys today sometimes have more power in</p> <p>24 the relation -- well, I just told you that -- that under</p> <p>25 current law, they do.</p>	<p style="text-align: right;">Page 108</p> <p>1 the world, but the young had the power of beauty which</p> <p>2 to the estheticizing elite of an esthetically</p> <p>3 sophisticated civilization, there was no insubstantial</p> <p>4 advantage.</p> <p>5 That's still true today, isn't it?</p> <p>6 A. No, my sentence is in the past tense.</p> <p>7 Q. Okay. So, today, you don't think that the --</p> <p>8 because of the power of beauty of youth, they don't have</p> <p>9 an advantage over adult males in a sexual relations --</p> <p>10 relationship?</p> <p>11 A. They may in some cases, but I would also say</p> <p>12 that most people in our society are not part of the</p> <p>13 estheticizing elite. And I would also say our</p> <p>14 civilization now is not esthetically sophisticated;</p> <p>15 quite the contrary.</p> <p>16 Q. Let's go to page 132.</p> <p>17 A. Yes.</p> <p>18 Q. Under "A THOUGHT EXPERIMENT."</p> <p>19 A. Yes.</p> <p>20 Q. We have -- it -- it said -- you -- you -- well,</p> <p>21 go ahead and tell us what the question is that you pose.</p> <p>22 A. "To what extent can the evidence of the Greek</p> <p>23 model be applicable to modern Western societies?"</p> <p>24 Q. And let me stop you there. You're asking, to</p> <p>25 what evidence -- to what extent can the evidence of the</p>
<p style="text-align: right;">Page 107</p> <p>1 Q. Separate and apart -- I'm talking about the</p> <p>2 power to entice sexual relations. Do you believe that</p> <p>3 sometimes boys entice older men into sexual</p> <p>4 relationships by their youth and beauty?</p> <p>5 A. Yes.</p> <p>6 Q. Okay.</p> <p>7 A. There are many boys who initiate the</p> <p>8 relationships.</p> <p>9 Q. Okay.</p> <p>10 A. As in the example -- and this is quite</p> <p>11 frequent -- of boys who can go on these adult hook-up</p> <p>12 sites and pretend to be 18 when they're younger.</p> <p>13 Q. And because of -- of their youth and beauty,</p> <p>14 oftentimes it's the boys who have the power in the</p> <p>15 relationship and the adult is powerless, true?</p> <p>16 MR. SIBLEY: Objection.</p> <p>17 A. Well, the boys have -- have the power to</p> <p>18 withdraw from the relationship. They have the power to</p> <p>19 go to their parents or the police and misrepresent the</p> <p>20 relationship. I mean, if they find that the</p> <p>21 relationship starts to become something they no longer</p> <p>22 enjoy or feel that the man is abusive, they can cause</p> <p>23 him an awful lot of problem.</p> <p>24 Q. (BY MR. PRINGLE, JR.) You say: Older men might</p> <p>25 have more money, social connections, or experience of</p>	<p style="text-align: right;">Page 109</p> <p>1 Greek model of pederastic sexual relations between adult</p> <p>2 males and young boys, correct?</p> <p>3 A. Teenage boys.</p> <p>4 Q. Teenage boys.</p> <p>5 And you want to know, to -- to what</p> <p>6 evidence can that model be applicable to today. Go</p> <p>7 ahead.</p> <p>8 A. Yes, and -- and what I go on to say in --</p> <p>9 Q. Go ahead and read it.</p> <p>10 A. Oh, you want me to read the whole paragraph?</p> <p>11 Q. Yeah. Go ahead and . . .</p> <p>12 A. "We have in Greece the documented record of a</p> <p>13 culturally advanced and highly successful society: It</p> <p>14 suggest that where age-discrepant relationships are</p> <p>15 commonplace and positively reinforced, they cause little</p> <p>16 or no long-term harm to the younger partner and often</p> <p>17 confer great benefit in elite enculturation."</p> <p>18 Q. So, in answer to your question of to what</p> <p>19 extent can the Greek model of sex between boys and men</p> <p>20 be applicable, you say: Well, we have in Greece this</p> <p>21 evidence of this barely advanced and successful society</p> <p>22 suggesting my muse -- or relationships are commonplace</p> <p>23 and reinforced, the boy's not hurt, and it converts --</p> <p>24 and -- and confers great benefits to society. Is that</p> <p>25 what you're saying?</p>

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<p style="text-align: right;">Page 110</p> <p>1 A. No. No. It confers great benefits in elite 2 enculturation. In other --</p> <p>3 Q. In benefit to society, though, isn't it?</p> <p>4 A. It -- it's a benefit to boys who are part of 5 the elite or ambitious to become part of the elite, and 6 that's not always. And, you know, in democratic 7 society, the elites are no longer as dominant as they 8 were in pre-democratic society.</p> <p>9 Q. So, the answer to your question is, to what 10 extent can evidence of Greek pederasty be applicable to 11 today's world? Well --</p> <p>12 A. Well --</p> <p>13 Q. -- here's -- here's what we know. That back in 14 Greece, when these pederastic relationships were 15 commonplace and positively reinforced, didn't hurt the 16 boys a bit and conferred greater benefit to them, right? 17 That's how it could've -- that's how it could be 18 applicable to modern societies.</p> <p>19 A. What I am saying there is from the Greek 20 evidence -- which I have studied thoroughly. I, you 21 know, published a 600-page sourcebook collecting all the 22 relevant text. Aside from the myth of Chrysippus, which 23 we discussed -- and that was a myth formulated by the 24 Cryogenian Euripides -- we now have evidence that -- 25 that -- you know, boys felt harmed by this. The fact</p>	<p style="text-align: right;">Page 112</p> <p>1 then. Why isn't that applicable today?</p> <p>2 A. As I previously stated in response to your 3 previous question: We are not a society that encourages 4 elite enculturation. We are a democratic society. And 5 as I argued in this other article we talked about, 6 pederasty is fundamentally incompatible with democracy.</p> <p>7 Q. So, why is that the answer to -- to what extent 8 can the evidence of the Greek model be applicable to 9 modern western societies? Why do you answer it that 10 way? That's the question you pose, and you answer it: 11 It was great back then. This should be applicable to 12 modern society.</p> <p>13 A. If modern society were to return to being an 14 aristocratic society in which you learned elite behavior 15 from other elite men, it might present advantages. And 16 then as I go on to say in the next sentence: Such 17 relationships provided the young men, the erastés, the 18 lovers with an alternative to early marriage and --</p> <p>19 Q. You say that in addition?</p> <p>20 A. Yes, so that's another answer to the question. 21 And a third answer to the question is what I say later 22 in this section, is what it proves about the capacity of 23 teenage boys to assert consent or nonconsent. And all 24 of our Greek evidence, whether either graphic or 25 literary very much shows they did because there is much</p>
<p style="text-align: right;">Page 111</p> <p>1 that it was mainly elite boys who were the ideal love 2 object and who would become future members of the elite, 3 also, you know, tells us, in a context where people 4 approve of such relationships, they are not necessarily 5 harmful.</p> <p>6 Now -- now we are not an elite oriented 7 society today. And the other thing that I go on to 8 explain in this section is that the real relevance is 9 that it shows that teenage boys were considered by the 10 Greeks to have the power of volition. In other words, 11 the power to give or withhold consent in Greek society. 12 So, any arguments that are based on a, kind of, 13 universalizing assertion that no one below the age of 18 14 or 17 is capable of understanding enough about sex to 15 give consent are -- are really inconsistent with the 16 historical and anthropological and even psychological 17 evidence.</p> <p>18 Q. But you're touting of the benefits of these 19 pederastic sexual relationship between man and boy, that 20 when it's commonplace and reinforced, it causes little 21 to no long-term harm to the younger partner and confers 22 great benefits, and -- and that's the answer to the 23 question of: How can this be applicable to the modern 24 world? And your response is: Well, look at all -- look 25 at all it did for Ancient Greece. It was great back</p>	<p style="text-align: right;">Page 113</p> <p>1 evidence of boys turning men down, emphatically turning 2 them down, or choosing to abandon a partner for someone 3 else.</p> <p>4 Q. Could so -- could someone reading your article 5 come away with the conclusion that it's your opinion 6 that where age-discrepant relationships are commonplace 7 and positively reinforced, sex between man and boy, they 8 cause little or no long-term harm to the partner and he 9 actually benefits from it?</p> <p>10 MR. SIBLEY: Objection.</p> <p>11 A. That was the situation in Ancient Greece based 12 on the evidence we have.</p> <p>13 Q. (BY MR. PRINGLE, JR.) And is it your opinion 14 that's the case today?</p> <p>15 A. No, because they are not positively reinforced 16 in our society.</p> <p>17 Q. But if I they were --</p> <p>18 A. They --</p> <p>19 Q. -- positive --</p> <p>20 A. -- they -- they are -- are -- are very much 21 stigmatized.</p> <p>22 Q. So, then, how is that applicable to modern 23 western societies, what you -- what you cite there?</p> <p>24 A. It shows that such relationships are not 25 inherently harmful as a law of nature, because we have</p>

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<p style="text-align: right;">Page 114</p> <p>1 all these societies where it is. And it's not just 2 Ancient Greece. This is well attested in the 3 anthropological record and in the historical record of 4 virtually all of western civilization and eastern 5 civilization too. I mean, the Chinese don't even have 6 the concept of an age of consent.</p> <p>7 Q. So, there's nothing inherently harmful 8 between -- in -- in sex between an adult male and a 9 14-year-old boy, in your mind?</p> <p>10 A. Given that there are so many 14 year olds -- 11 even in our society today where it is not positively 12 enforced who -- who say that they found it a positive 13 experience; that even with the extreme stigmatization of 14 those relationships today, there are still a lot 15 nevertheless say it was positive.</p> <p>16 Now, if -- if our society were like 17 Ancient Greece, in terms of celebrating such 18 relationships as -- as something that is fashionable and 19 elite, the situation would be very different. But, of 20 course, that's not true in our society. It's not likely 21 to become true in our society. Again, as I've argued in 22 the other article, it's fundamentally incompatible with 23 democracy, and I -- I do -- whatever else happens, I 24 don't see us returning to an aristocratic system.</p> <p>25 Q. Well, you go on to pose the question, at the</p>	<p style="text-align: right;">Page 116</p> <p>1 harmful and exploitive, but it often is; but not always. 2 Again, I mean you've got this percentage of -- of people 3 who say that those relationships -- reflecting back in 4 their adult years on the relationships they had as 5 adolescents with someone who may've been a few years 6 older, we -- we have people saying that, on balance, it 7 was more positive than negative.</p> <p>8 Q. Or at least I remember the quote. At least I'm 9 telling you I remember it that way. That's what we're 10 hearing, right?</p> <p>11 A. I -- I think as I have said previously, most 12 people remember their first sexual experience very 13 powerful and remember whether it was something they were 14 into or -- or something that, you know, they found to be 15 traumatic.</p> <p>16 Q. Or something they found to be shameful and 17 never to be repeated again?</p> <p>18 A. Yes, that, too --</p> <p>19 Q. Yeah.</p> <p>20 A. -- because it's marginalized in our society. I 21 mean, we -- we have no-nothing social workers who 22 haven't studied the real scholarship but just 23 communicate whatever they learned in their MSW program 24 of -- who convinced people who tell them that they had 25 sexual relationships that: Oh, you were really</p>
<p style="text-align: right;">Page 115</p> <p>1 top of page 134, to the similar flexibility in regard to 2 sexuality and symbol -- citizenship fit the modern world.</p> <p>3 A. I pose a question.</p> <p>4 Q. And how do you answer it?</p> <p>5 A. Under certain conditions, it might be able to.</p> <p>6 Q. Under certain conditions, sex between an adult 7 male and a 14-year-old boy might fit in modern world?</p> <p>8 A. It -- it fits the modern world in Germany, and 9 Italy, and -- and Taiwan, and South Korea, and all these 10 other countries. And the evidence is that mental -- 11 that adolescent mental health suicide rate -- adolescent 12 suicide rates are -- are lower in those countries. The 13 mental health of adolescents is generally better in 14 countries that have a more tolerant attitude to 15 sexuality and give young people better sex education 16 than we do here in the U.S.</p> <p>17 Q. You question whether pederastic mentorship is 18 harmful and exploitative in our society. That's 19 something that -- that's a question that you asked, 20 correct?</p> <p>21 A. Yes, it's a question. That's what we do as 22 scholars is we ask questions. We don't always have the 23 answers.</p> <p>24 Q. You got an answer to that one though?</p> <p>25 A. I -- I believe that it is not necessarily</p>	<p style="text-align: right;">Page 117</p> <p>1 exploited. You -- you may have thought that you liked 2 that man and that he was really helping you, but he was 3 exploiting you. He was using you.</p> <p>4 And all your life problems can be traced 5 back to that. That is what a lot of rather stupid 6 social workers tell their clients, and --</p> <p>7 Q. Well --</p> <p>8 A. -- it's very harmful.</p> <p>9 Q. What you say is: There's much wisdom that can 10 only be learned through one-on-one interaction with an 11 older and more experienced practitioner of an art or 12 skill.</p> <p>13 A. Yes.</p> <p>14 Q. By that, are you meaning that a young man of 15 14, 15 year old can learn quite a bit from sex with an 16 older man?</p> <p>17 A. He can learn quite a bit about sex. I mean, an 18 older part -- a partner who's a few years older is much 19 more likely to practice safe sex than if the boy is 20 having sex with someone his own age. He's much more 21 likely, you know --</p> <p>22 Q. He -- he probably perfected his technique?</p> <p>23 A. Yes. And, yeah, I mean he -- he's much more 24 likely to know how to have anal sex without it hurting 25 than another 16 or 15 year old would. He -- and he's --</p>

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<p style="text-align: right;">Page 118</p> <p>1 he's -- you know, he -- he's more mature in other 2 respects. I mean, he's less likely to use force. I 3 mean, you know about the peak ages are for likelihood to 4 commit rape? They're 17 and 18.</p> <p>5 Q. So, these things about the techniques of anal 6 sex and how to perform sexually, that's something that a 7 14-year-old boy can, and probably should, learn from an 8 older practitioner?</p> <p>9 MR. SIBLEY: Objection.</p> <p>10 A. I'm not saying "should."</p> <p>11 Q. (BY MR. PRINGLE, JR.) But they certainly can.</p> <p>12 A. I'm saying "can," but I'm not saying "should."</p> <p>13 Q. And you want to give that 14-year-old boy the 14 opportunity to do that?</p> <p>15 A. If he wants to and if it is legal in his 16 jurisdiction.</p> <p>17 Q. And do you think it should be legal in -- in 18 all jurisdictions?</p> <p>19 A. I would be comfortable with an age of consent 20 of either 14 or 15 for adolescent boys --</p> <p>21 Q. Okay.</p> <p>22 A. -- but not for adolescent girls.</p> <p>23 Q. What -- what about for teens who are neither 24 boys nor girls?</p> <p>25 A. I mean, for -- for those who are gender queer</p>	<p style="text-align: right;">Page 120</p> <p>1 talking about someone who is genuinely gender neutral 2 and has been rendered such by puberty blockers, I think 3 it would be problematic.</p> <p>4 Q. How do you articulate this different age of 5 consent, one for boys and one for girls, when that 6 doesn't cover everybody?</p> <p>7 MR. SIBLEY: Objection, form. Objection.</p> <p>8 A. Well, separate provision would have to be made 9 for the other varieties of gender identity --</p> <p>10 Q. (BY MR. PRINGLE, JR.) How would --</p> <p>11 A. -- and I don't -- I personally don't know the 12 answer to that question. I don't know everything, 13 believe it or not. I mean, I ask questions; that's what 14 scholars do. I don't have all the answers; none of us 15 do.</p> <p>16 Q. You go on to say -- where you talk about how 17 these kinds of things, like anal penetration, can be 18 learned through one-on-one interaction with an older, 19 more experienced practitioner, or skill. You go on to 20 say that particularly for those not born to privileged 21 family backgrounds or who -- boys who grow up without 22 fathers, social graces or eloquence and more awareness 23 can most readily come from close personal intimacy with 24 older, respected, extra -- extrafamilial role models 25 en -- embody in these capacities.</p>
<p style="text-align: right;">Page 119</p> <p>1 and --</p> <p>2 Q. What's --</p> <p>3 A. -- or for --</p> <p>4 Q. -- your age of consent for them?</p> <p>5 A. -- transsexual, the evidence shows that they 6 are less likely to want to be sexual with anyone --</p> <p>7 Q. And my --</p> <p>8 A. -- for that age.</p> <p>9 Q. -- question's different though. What is --</p> <p>10 what is your position on the appropriate age of consent 11 for individuals who don't declare as a boy or a girl?</p> <p>12 MR. SIBLEY: Objection.</p> <p>13 A. It -- it depends on the individual 14 circumstances. If they have been given puberty 15 blockers, which is an increasingly common prescription 16 for prepubescent kids who question their gender 17 identity, then they have not yet come to puberty. And 18 if you remember my saying, that -- that I only advocate 19 sexual freedom for boys who have reached the age of 20 puberty.</p> <p>21 Now, if a female-to-male individual is 22 receiving heavy doses of testosterone and hormonal 23 treatment, then their sexual desires may be intensified, 24 in -- in which case, you know, we -- we should consider 25 giving them the same choices as boys. But if you're</p>	<p style="text-align: right;">Page 121</p> <p>1 Are you saying that boys can acquire the 2 social graces and more eloquence and more awareness from 3 an adult with whom they have a sexual relationship?</p> <p>4 A. Yes. Many boys are -- I mean grow up in 5 dysfunctional families, particularly gay boys whose 6 families may not approve of that identity or may kick 7 them out of their house.</p> <p>8 I -- I feel I've learned a great deal from 9 my first relationship, which, you know, wasn't an adult 10 age but with a man 16 years older than me who, you know, 11 was of much higher social class than my family was.</p> <p>12 Q. All right. But you're saying that this 13 phenomenon of pederasty, of sex between boys and men, 14 can also provide such boys with a father figure?</p> <p>15 A. Yes. I mean, quite often -- like, I would say 16 more often than not, boys who are gay or bisexual tend 17 to have a missing father.</p> <p>18 Q. And so your solution, then, is a sex partner?</p> <p>19 A. I think --</p> <p>20 Q. It's one solution?</p> <p>21 A. -- I -- it is one possible solution. It's not 22 the only one.</p> <p>23 Q. Okay. And I'm onto the next page, on the right 24 side of the page there. No, don't -- you don't even 25 need to flip it. It's 135.</p>

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<p style="text-align: right;">Page 122</p> <p>1 A. Uh-huh.</p> <p>2 Q. You talk about "liberal sex education curricula</p> <p>3 in the U.S." Do you see that sentence that about six</p> <p>4 or --</p> <p>5 A. Is this --</p> <p>6 Q. -- seven lines?</p> <p>7 A. -- in the first paragraph?</p> <p>8 Q. Yeah, it's about six or seven lines down.</p> <p>9 A. Oh, okay. Yes, I see.</p> <p>10 Q. "liberal sex education curricula in the U.S.</p> <p>11 centers upon sexuality as something for risk and danger</p> <p>12 for the young, whether in the form of unplanned</p> <p>13 pregnancy or sexual transmitted diseases."</p> <p>14 You seem critical of that. Are you</p> <p>15 critical of that?</p> <p>16 A. It was certainly the nature of the sex</p> <p>17 education that I received at a fairly progressive high</p> <p>18 school in, you know, well-to-do San Francisco suburb.</p> <p>19 It was almost all about diseases and pregnancy. There</p> <p>20 was nothing about relationship education. Scant mention</p> <p>21 of love and what it means to love and care for another</p> <p>22 person. It would typically be either the biology</p> <p>23 teacher or one of the coaches who would teach those</p> <p>24 classes. And -- and -- and, you know, California, in</p> <p>25 the 1970s, was a -- a pretty progressive state compared</p>	<p style="text-align: right;">Page 124</p> <p>1 Q. -- correct?</p> <p>2 A. Yes, I do.</p> <p>3 Q. Because you say: Virtually no curriculum</p> <p>4 instruct students in options and techniques for</p> <p>5 generating and multiplying mutual pleasure, which is</p> <p>6 what sexuality should really be about.</p> <p>7 Did I read that correctly?</p> <p>8 A. Yes. That's a point that a lot of scholars</p> <p>9 examining American sex education make. I mean, Judith</p> <p>10 Levine, Janice Irvine.</p> <p>11 Q. Is it your -- is it your position, then, that</p> <p>12 sex education curriculum in the public school system</p> <p>13 should be teaching techniques for generating and mul --</p> <p>14 multiplying mutual pleasure, such as masturbation</p> <p>15 techniques, oral sex techniques, anal penetration</p> <p>16 techniques; things of that nature?</p> <p>17 A. Surgeon General Joycelyn Elders recommended it</p> <p>18 include masturbation.</p> <p>19 Q. Okay. And you agree with that, that should be</p> <p>20 part of sex education?</p> <p>21 A. Yes, just as the -- the risks and dangers</p> <p>22 should. I think it should be a mix of -- of what sex</p> <p>23 can offer that is good and, you know, what the risks</p> <p>24 are.</p> <p>25 Q. Let's go on to the next paragraph: Sex</p>
<p style="text-align: right;">Page 123</p> <p>1 to much of the rest of the U.S.</p> <p>2 Q. So, you -- you would agree that those are</p> <p>3 proper subjects in sex education, right, unplanned --</p> <p>4 A. Oh, yes. It --</p> <p>5 Q. -- pregnancy --</p> <p>6 A. -- should be included.</p> <p>7 Q. -- and sexually transmitted diseases?</p> <p>8 A. It should be included, but it should not be the</p> <p>9 only thing, 'cause if you make it the only thing, that</p> <p>10 fright -- frightens young people and makes them consider</p> <p>11 sex dangerous and -- and something that's going to be</p> <p>12 traumatic, and I don't think that's psychologically</p> <p>13 healthy.</p> <p>14 Q. Isn't sex a little dangerous?</p> <p>15 A. Life is a little dangerous. In fact, more than</p> <p>16 a little.</p> <p>17 Q. Life doesn't create babies; sex does. So,</p> <p>18 isn't sex a little dangerous for kids?</p> <p>19 MR. SIBLEY: Objection.</p> <p>20 A. Unprotected sex is.</p> <p>21 Q. (BY MR. PRINGLE, JR.) But you're say --</p> <p>22 A. Sex without birth control is.</p> <p>23 Q. You go on to criticize the curriculum in public</p> <p>24 school systems --</p> <p>25 A. Uh-huh.</p>	<p style="text-align: right;">Page 125</p> <p>1 education is always awkward within the nuclear family,</p> <p>2 where any positive discussion of sex gives off a whiff</p> <p>3 of incest.</p> <p>4 What does that mean? Somebody talks about</p> <p>5 incest, you think that dad wants to screw you?</p> <p>6 A. No, that's not what I say. But, if -- if, you</p> <p>7 know, parents encourage or appear to be encouraging of</p> <p>8 sexual activity among their kids, particularly sexual</p> <p>9 activity of a certain sort, that can be very</p> <p>10 uncomfortable for them.</p> <p>11 Q. You think sex education in the nuclear family</p> <p>12 should be the parents encouraging their kids in sexual</p> <p>13 activity?</p> <p>14 A. No. I think it's better left to someone whom</p> <p>15 the parents trust who is outside the fam -- immediate</p> <p>16 family.</p> <p>17 Q. So, why does --</p> <p>18 A. And that's why it should be part of a</p> <p>19 curriculum in high school.</p> <p>20 Q. Why does positive discussion of sex give off a</p> <p>21 whiff of incest? I don't get that at all.</p> <p>22 A. All I can say is that my experience as an</p> <p>23 adolescent was I was very uncomfortable any time my</p> <p>24 parents talked about it.</p> <p>25 Q. Okay. That's a sample size --</p>

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<p style="text-align: right;">Page 126</p> <p>1 A. Being --</p> <p>2 Q. -- of one.</p> <p>3 A. -- be -- well, yes, but I think it's probably</p> <p>4 an experience a lot of gay teenagers have, given that</p> <p>5 their parents have, in most cases, no experience of</p> <p>6 being sexual . . .</p> <p>7 Q. But you say: Any positive discussion of sex</p> <p>8 gives off a whiff of incest.</p> <p>9 You're basing that just on your own</p> <p>10 personal experience and nothing else?</p> <p>11 A. Well, my experience and the experience of -- of</p> <p>12 other gay men I know. I'm primarily thinking about gays</p> <p>13 there.</p> <p>14 Q. And -- and you say: This pedagogical</p> <p>15 mentorship by someone older, trusted, admired friend</p> <p>16 such a bad idea? Can you --</p> <p>17 A. I'm ask -- I'm asking questions; I'm not giving</p> <p>18 answers.</p> <p>19 Q. I know. But when you ask if it's such a bad</p> <p>20 idea, doesn't that suggest it may not be a bad idea?</p> <p>21 A. I mean, show me where on the page this says --</p> <p>22 Q. It says: "In this context, is pedagogical</p> <p>23 mentorship by someone older, trusted and admired friend</p> <p>24 such a bad idea?"</p> <p>25 A. It's a good question.</p>	<p style="text-align: right;">Page 128</p> <p>1 also need to note what I say there about primate</p> <p>2 behavior, which was discussed in an earlier article in</p> <p>3 the special issue.</p> <p>4 Q. I'm gonna get there. I haven't gotten there</p> <p>5 yet.</p> <p>6 A. Well, I mean it's entirely relevant to that</p> <p>7 question.</p> <p>8 Q. Okay. So, have you answered that question? Is</p> <p>9 pedagogical mentorship by an older, trusted, and admired</p> <p>10 friend a bad idea? And doesn't one learn by doing?</p> <p>11 Doesn't one learn to have sex by having sex with an</p> <p>12 older, trusted, and admired friend?</p> <p>13 A. Well, where do you say that I ask that?</p> <p>14 Q. I'm waiting. I'm waiting for your answer.</p> <p>15 A. I don't know the answers. I pose questions;</p> <p>16 that's what scholars do.</p> <p>17 Q. So, you pose this question, and you don't</p> <p>18 answer it?</p> <p>19 A. I am epistemologically humble.</p> <p>20 Q. Well, I don't have an -- no idea what that</p> <p>21 means.</p> <p>22 A. I -- I've told you I don't --</p> <p>23 Q. I told you the history --</p> <p>24 A. -- know all the answer. I don't know all the</p> <p>25 answers. I -- I -- I pose questions to help people get</p>
<p style="text-align: right;">Page 127</p> <p>1 Q. You asked it.</p> <p>2 A. I don't necessarily have the answer.</p> <p>3 Q. Well, isn't -- isn't the comp -- isn't the gist</p> <p>4 of that question questioning whether it's a bad idea or</p> <p>5 not?</p> <p>6 A. Yes --</p> <p>7 Q. Okay.</p> <p>8 A. -- in a situation of pedagogical mentorship.</p> <p>9 Now, not all sexual relations between adults and</p> <p>10 adolescents are that.</p> <p>11 Q. Well, you're talking about positive sex --</p> <p>12 positive discussions of sex, and then your next sentence</p> <p>13 says, "As with most other skills, doesn't one learn by</p> <p>14 doing?"</p> <p>15 Are you suggesting that one learns sex by</p> <p>16 performing sex?</p> <p>17 A. Yes.</p> <p>18 Q. And does this just follow your question about</p> <p>19 mentorship by older, trusted, and admired friend?</p> <p>20 A. Yes.</p> <p>21 Q. And so are you suggesting that young boys could</p> <p>22 learn those skills by engaging them with a older,</p> <p>23 trusted, mature sexual partner?</p> <p>24 A. I think they would -- it would be more</p> <p>25 pedagogical to someone more experienced, yes. And you</p>	<p style="text-align: right;">Page 129</p> <p>1 outside the box of their own received assumptions.</p> <p>2 Q. So, then --</p> <p>3 A. And that disturbs some people, but it's what</p> <p>4 intellectuals do.</p> <p>5 Q. So, as we sit here today, you don't know your</p> <p>6 position about whether or not pedagogical member --</p> <p>7 mentorship with an older, trusted, and admired friend is</p> <p>8 a bad idea?</p> <p>9 A. Well, I would say, if by pedagogical</p> <p>10 mentorship, we are talking about mentorship in -- in all</p> <p>11 respects. It usually is a good idea. Now, if we're</p> <p>12 talking specifically about sexual pedagogy --</p> <p>13 Q. Which is what you're talking about here.</p> <p>14 A. -- is, that -- it's still formulated as a</p> <p>15 question to which I do not have a certain answer.</p> <p>16 Q. So, you can't answer that idea, whether it's a</p> <p>17 good idea for young people to learn by doing, by having</p> <p>18 sex with an older man; you just don't know?</p> <p>19 A. Can I talk about the primate behavior that is</p> <p>20 part of this sentence? That will explain my answer.</p> <p>21 Q. I need an answer to that. Do -- do you know</p> <p>22 whether you have an answer to that question?</p> <p>23 A. I cannot answer it unless I'm allowed to</p> <p>24 explain the whole sentence.</p> <p>25 Q. Okay. Let's -- you want to talk about the</p>

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<p style="text-align: right;">Page 130</p> <p>1 monkeys, talk about the monkeys. Go ahead.</p> <p>2 A. Well, actually we're talking about the greater</p> <p>3 apes.</p> <p>4 Q. Okay.</p> <p>5 A. And what the zoological studies have shown is</p> <p>6 that relationships between an older and stronger ape and</p> <p>7 a younger one, whose development is approximately equal</p> <p>8 to the adolescent stage in humans, that -- that such</p> <p>9 same sex relationships and also opposite sex</p> <p>10 relationships are quite common in the behavior of our</p> <p>11 evolution -- of our most direct evolutionary ancestors.</p> <p>12 And what the studies have shown, that it</p> <p>13 is that if apes have absolutely no experience as</p> <p>14 adolescents, that they are not capable of mating then</p> <p>15 when they become adult. And it also shows that it's</p> <p>16 very seldom that adolescent stage apes have sex with</p> <p>17 other adolescent stage apes. It is usually with an ape</p> <p>18 who is older and stronger and can help protect them in</p> <p>19 the very competitive communities that colonies of apes</p> <p>20 tend to be. That's what the zoology and evolutionary</p> <p>21 biology shows.</p> <p>22 Q. Perfect. Let's go on to the next sentence.</p> <p>23 And again, you're still talking about the -- the skills</p> <p>24 and the benefits of personal, intimate relations between</p> <p>25 adult males and 14-year-old boys.</p>	<p style="text-align: right;">Page 132</p> <p>1 answer them.</p> <p>2 A. I'm posing a rhetorical question as an answer.</p> <p>3 Q. Okay. And I'll take that.</p> <p>4 A. And all of these are rhetorical questions.</p> <p>5 Q. Yeah. But your position is, young men learn</p> <p>6 the most about sex from having sex with older men?</p> <p>7 A. I certainly did.</p> <p>8 Q. And that's an advantage of those pederastic</p> <p>9 relationships.</p> <p>10 A. I believe so. An advantage of many of them, as</p> <p>11 long as there's no coercion, or manipulation, or legal</p> <p>12 village.</p> <p>13 Q. Then, you go on to say -- you -- you -- and</p> <p>14 this is where you -- on the next page. This is page</p> <p>15 136. You talk about Dr. Rind?</p> <p>16 A. Uh-huh.</p> <p>17 Q. You say: Most gay or bisexual men who as</p> <p>18 underage children had sexual relationships with a</p> <p>19 significantly older partner rate the relationship with</p> <p>20 somewhat positive in their development if it was</p> <p>21 noncoercive and sustained, correct?</p> <p>22 A. Yes, that's this 2001 article.</p> <p>23 Q. Right.</p> <p>24 A. Which was based on Rich Savin-Williams' work.</p> <p>25 Q. And there was some controversy about</p>
<p style="text-align: right;">Page 131</p> <p>1 You -- you asked the question: Doesn't</p> <p>2 one learn the most from those who are already</p> <p>3 experienced rather than some other -- from other</p> <p>4 blundering ill-informed, emotionally immature teenagers?</p> <p>5 A. It's a good question.</p> <p>6 Q. Yeah, and you say: Doesn't one learn the most?</p> <p>7 You think they do learn the most? That --</p> <p>8 that youths can learn the most about sex from an adult?</p> <p>9 You show them the ropes, whose already experienced</p> <p>10 rather than those other blundering teenagers?</p> <p>11 A. Isn't it obvious?</p> <p>12 Q. You believe that?</p> <p>13 A. Oh. I -- it's obvious in all matters, that one</p> <p>14 learns more from someone who is experienced and more</p> <p>15 mature than from someone who is equally unexperienced</p> <p>16 and immature.</p> <p>17 Q. So, you meant --</p> <p>18 A. I mean, that -- that's a true -- it's almost a</p> <p>19 truism.</p> <p>20 Q. If you say-so.</p> <p>21 You ask --</p> <p>22 A. I mean, do -- do you think kids get better</p> <p>23 education about sex from other kids than they do from</p> <p>24 adults.</p> <p>25 Q. See, I get to ask the questions; you get to</p>	<p style="text-align: right;">Page 133</p> <p>1 publication of that article, correct?</p> <p>2 A. No, there was not.</p> <p>3 Q. And do you know Dr. Rind?</p> <p>4 A. Yes, I do.</p> <p>5 Q. And how do you know him?</p> <p>6 A. I first met him when I was a fellow at the</p> <p>7 Institute for Advanced Study in Princeton, because he</p> <p>8 lives in Philadelphia.</p> <p>9 Q. And so that would've been what, in --</p> <p>10 A. 2002.</p> <p>11 Q. So, you've known Dr. Rind since 2002, and</p> <p>12 Dr. Rind's from Philadelphia?</p> <p>13 A. Yes.</p> <p>14 Q. And how often do you see Dr. Rind?</p> <p>15 A. Well --</p> <p>16 Q. Can -- can I -- can I --</p> <p>17 A. -- maybe once a year or so.</p> <p>18 Q. I was gonna broaden that to how often do you</p> <p>19 have contact with him?</p> <p>20 A. Oh. I mean, he and I talk on the phone and --</p> <p>21 and communicate via e-mail rather often.</p> <p>22 Q. Daily? Weekly? Monthly?</p> <p>23 A. Oh, certainly not daily; maybe monthly.</p> <p>24 Q. Okay. And Dr. Rind, has he ever been a member</p> <p>25 of NAMBLA?</p>

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<p style="text-align: right;">Page 134</p> <p>1 A. Not that I know of.</p> <p>2 Q. Have you ever asked him?</p> <p>3 A. No.</p> <p>4 Q. Had -- has Dr. Rind ever spoken at NAMBLA?</p> <p>5 A. Not that I know of.</p> <p>6 Q. Have you ever asked him?</p> <p>7 A. No.</p> <p>8 Q. Has Dr. Rind come under any sort of criticism 9 for his studies?</p> <p>10 A. Yes, certainly.</p> <p>11 Q. Okay. You go on to say --</p> <p>12 A. Criticism by -- I mean, the only two articles 13 that attacked his studies were by some psychologists who 14 believe in recovered memory syndrome and multiple 15 personality disorder, and, you know, the -- these 16 strange phenomena that have been thoroughly debunked in 17 psychology. His article was published in Psychological 18 Bulletin, which is the top rated academic journal in 19 that field. It was subjected to -- now because of the 20 political objections, it was subjected to the deet -- a 21 special issue of that journal later on. It was looked 22 into by the American Academy of Sciences, and -- and all 23 of those concluded that this was unproblematic.</p> <p>24 MR. PRINGLE, JR.: Objection, 25 nonresponsive.</p>	<p style="text-align: right;">Page 136</p> <p>1 answer that question? Have we set up a legal regime 2 that does unnecessary harm to underage males by imposing 3 an age of consent on them that prevents them from 4 hooking up with adult males?</p> <p>5 A. I think in the case of -- of gay adolescents, 6 may -- gay male adolescents, who are the ones that I'm 7 primarily concerned with in my work, I -- I think, lack 8 of -- of sexual experimentation is psychologically 9 probable, and this is often not feasible with their own 10 couverts. I -- I -- I mean, numerous studies have shown 11 that gay boys tend to have sex at an earlier age than 12 heterosexual boys and that their partners tend to be 13 older than the partners of heterosexual boys.</p> <p>14 MR. PRINGLE, JR.: Objection, 15 nonresponsive.</p> <p>16 Q. (BY MR. PRINGLE, JR.) So, is the answer to that 17 question "yes," that in our zeal to protect vulnerable 18 underage females, you've set up a regime that does 19 unnecessary harm to underage males by suppressing and 20 even punishing their sexual urges?</p> <p>21 A. I -- I will stand by my answer that --</p> <p>22 Q. Is that "yes"?</p> <p>23 A. -- you said was nonresponsive.</p> <p>24 Q. But is it "yes," that we have to atone for 25 them? That's all I want to know.</p>
<p style="text-align: right;">Page 135</p> <p>1 Q. (BY MR. PRINGLE, JR.) You go on to -- if I pose 2 the question again -- question but no answer -- but you 3 say -- and I'm reading from here.</p> <p>4 A. Uh-huh.</p> <p>5 Q. Right before III.</p> <p>6 A. Uh-huh.</p> <p>7 Q. You ask: "Could it be that in our zeal to 8 predict vulnerable underage females, we have set up a 9 legal regime that does unnecessary harm to underage 10 males by suppressing and even punishing the entirely 11 natural and powerful sexual urges that every male feels 12 at the age of puberty, but cannot always fulfill with 13 partners his own age?"</p> <p>14 A. Yes.</p> <p>15 Q. Do you have any --</p> <p>16 A. This is particularly true for gay males who 17 are -- are reluctant to come out among their high school 18 peers.</p> <p>19 Q. And so your position is, if it isn't for those 20 gay males, adult males is often all they have?</p> <p>21 A. Yes, that's why so many of them go on to these 22 hook-up sites pretending to be 18, when they're not.</p> <p>23 MR. PRINGLE, JR.: Objection, 24 nonresponsive.</p> <p>25 Q. (BY MR. PRINGLE, JR.) So -- okay. So, can you</p>	<p style="text-align: right;">Page 137</p> <p>1 A. The answer is more complex than a simple "yes" 2 or "no."</p> <p>3 Q. Is it more "yes" than "no"?</p> <p>4 A. There is evidence that it could be a "yes." 5 I -- I'm not aware of the evidence that it is likely 6 "no," but if you want to present it to me, I will 7 consider it and respond. Where -- where -- where is 8 your evidence that it's not?</p> <p>9 Q. Did you quantify the sentence by limiting it to 10 the -- to the young gay males that you're concerned 11 with, or is it a -- does your sentence apply to all 12 boys?</p> <p>13 A. It would apply to heterosexual boys who might 14 want an experience of -- with an adult woman, given 15 that, you know, the -- the -- the models of female 16 beauty that we have in our society are often, you know, 17 actresses or models.</p> <p>18 I remember back when I was growing up, it 19 was Raquel Welch that all of us wanted to -- or -- or 20 that those of us who were heterosexual wanted to be 21 with, and even I found Raquel Welch very attractive.</p> <p>22 I -- I've had some heterosexual men tell 23 me that there relationship with a sympathetic adult 24 female is what saved their life and that otherwise they 25 would've committed suicide. So, yes, when you're</p>

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<p style="text-align: right;">Page 138</p> <p>1 talkings needs to be timed, I -- I believe that this 2 applies to heterosexual boys in relation with -- with -- 3 with women.</p> <p>4 Studies have shown that, you know, by the 5 age of 12 or 13, the vast majority of boys and even 6 girls have seen online pornography, and all of the 7 models practicing sex, very raw sex are adults. So, 8 it -- it's -- it's not unreasonable that that is 9 what they would associate with being sexually attractive 10 and -- as opposed to some skinny, silly high school 11 girl.</p> <p>12 MR. PRINGLE, JR.: Objection 13 nonresponsive.</p> <p>14 Q. (BY MR. PRINGLE, JR.) Let's go on to the next 15 page. It's actually page 138. It's a -- this is -- 16 this is at the end of a discussion about the historical 17 evolution of the age of consent law. Are you with me?</p> <p>18 A. Yes, the historical evolution of the United 19 States and the U.K.</p> <p>20 Q. Yes.</p> <p>21 You say: "Many of the sad by-products of 22 the naive and self-righteous era, including the laws on 23 age of consent, linger with us."</p> <p>24 A. What part of the page?</p> <p>25 Q. Middle of the page on page -- it's the last</p>	<p style="text-align: right;">Page 140</p> <p>1 driver's license?</p> <p>2 THE REPORTER: I'm sorry, before he can?</p> <p>3 MR. PRINGLE, JR.: Get a driver's license.</p> <p>4 THE REPORTER: Thank you.</p> <p>5 A. The Greek evidence and the evidence of many 6 other cultures where the age of consent is 14 or 15 do 7 suggest that.</p> <p>8 Q. (BY MR. PRINGLE, JR.) Well, the Greeks didn't 9 have a driver's license, did they?</p> <p>10 A. But -- but what the evidence does show is that 11 before the age of 16.</p> <p>12 Q. And -- and your position is, it's a sad 13 by-product of an earlier age because the evidence is, is 14 that a proper age of consent or a better age of consent, 15 as you've articulated it, is 14 or 15 before they can 16 get a driver's license?</p> <p>17 A. Yes, I -- I -- I don't see what driving has to 18 do with a boy's sexual urges. These are completely 19 different realms of -- of activity.</p> <p>20 Q. Do you know why people have to wait till 21 they're 16 to get a driver's license?</p> <p>22 A. It -- it has to do with issues, like, height 23 and --</p> <p>24 Q. Height? You say "height"?</p> <p>25 A. Well, someone who's 4-feet tall has trouble</p>
<p style="text-align: right;">Page 139</p> <p>1 part of that paragraph, on page 139 -- 8.</p> <p>2 A. Yes, this is in the context of prohibition 3 being counterproductive and the war on drugs being 4 counterproductive.</p> <p>5 Q. So, you -- you continue to say, and I think you 6 testified earlier, that they were a legal fiction, that 7 the laws on the age of consent are a sad by-product of 8 earlier, uninformed times?</p> <p>9 MR. SIBLEY: Objection.</p> <p>10 A. Well, I -- I explained the historical origin of 11 raising the age of consent from what used to be 10 or 12 12, in all American states, to 16 or 18, which, you 13 know, that campaign began in the 1880s and continued 14 into the Progressive era. And, yes, I -- I -- I do 15 think that that time was one that had a lot of attitudes 16 toward sexuality that no longer characterize our simple 17 age today.</p> <p>18 Q. (BY MR. PRINGLE, JR.) And why is that 19 by-product sad?</p> <p>20 A. I, as a Libertarian, I think all efforts to 21 regulate sexual behavior by people who are cognizant 22 enough to assert consent and nonconsent are a 23 fundamental violation of human freedom and will.</p> <p>24 Q. And so you believe that a -- a child can -- 25 should be able to give consent before he can get a</p>	<p style="text-align: right;">Page 141</p> <p>1 driving a car. It -- it has to do with the greater 2 likelihood of them getting into accidents.</p> <p>3 Q. Why is that?</p> <p>4 A. Because of inexperience.</p> <p>5 Q. And judgment?</p> <p>6 A. Yes, perhaps.</p> <p>7 Q. Do you think that's one reason for these sad 8 by-products of the age of consent is a boy who's 14 9 maybe doesn't have a real good judgment yet?</p> <p>10 MR. SIBLEY: Objection.</p> <p>11 A. All we can do is look at the evidence of 12 countries or historical cultures where they did have 13 that freedom at the age of 14 or 15.</p> <p>14 Q. (BY MR. PRINGLE, JR.) But -- but that's not my 15 question. Do you think that's one reason for the 16 current age of consent, because a child of 14 doesn't 17 have a fully formed sense of judgment?</p> <p>18 A. Well, that's the reason that some people would 19 cite. I happen to think it's incorrect.</p> <p>20 Q. Okay. And on page 141 now of this article.</p> <p>21 A. Yes.</p> <p>22 Q. Now, the feminist -- at the top of the page. 23 Feminist advocacy of gender-neutral 24 language was not based on any evidence that sex between 25 adolescent boys and adult women (or for that matter</p>

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<p style="text-align: right;">Page 142</p> <p>1 adult men) was necessarily or even harmful to boys -- 2 usually harmful to boys."</p> <p>3 A. Yes, that's correct.</p> <p>4 Q. You haven't seen any evidence that sex between 5 adult men and adolescent boys is ever or mutually 6 harmful to boys?</p> <p>7 A. Oh, it -- it sometimes is. But again, the 8 studies that I have seen suggest that in the majority of 9 cases, if it is non -- if it is not coercive, it -- it 10 is not harmful. I mean, there have been studies, for 11 example, that have compared three -- I mean, it's been 12 studied in the archives of sexual behavior in the last 13 few years examining the differences between three 14 populations of the people whose first sexual experience 15 was with a peer of the same age, those who first -- 16 whose first sexual experience was as an adolescent with 17 an adult, and those whose sexual experience -- whose 18 first sexual experience did not occur until they were an 19 adult with another adult. And what those studies show 20 is that the later psychological adjustment of those 21 three populations was, approximately, the same. There 22 is no statistical difference.</p> <p>23 And moreover, that in terms of sexual 24 functioning, by which we mean things like erectile 25 dysfunction and the compulsivity, that, actually, the</p>	<p style="text-align: right;">Page 144</p> <p>1 gender-neutral language prevents the young boy, the 14 2 year old, from having sex -- consensual sexual relations 3 with an older and more adept man, true?</p> <p>4 A. Yes. There was -- I mean when state 5 legislatures considered incorporating gender-neutral 6 language into the age of consent laws, it was not based 7 upon any scientific testimony.</p> <p>8 Q. And you consider those sexual relations between 9 the 14-year-old boy and the adult man as, quote, proper 10 learning experiences, is -- be included within that 11 group?</p> <p>12 A. The word "proper" also means properly defined. 13 Look at the Oxford English Dictionary, III. Experiences 14 that can be properly defined as learning experiences. 15 Now not all sexual relations are.</p> <p>16 Q. But it's clear that you're referring here to 17 proper learning experiences as relations between teen 18 boys and adult men, among others, true?</p> <p>19 A. Experiences that are properly defined as 20 learning experiences.</p> <p>21 Q. Well, I'm -- I -- where does it --</p> <p>22 A. O-E --</p> <p>23 Q. -- say "defined"? I -- I didn't see that. 24 Where is that?</p> <p>25 A. That is the definition of the word proper in</p>
<p style="text-align: right;">Page 143</p> <p>1 group that rated the highest were those who, as 2 adolescents, had their first relationship with an adult. 3 So, yes, there -- there is no evidence that it is 4 harmful in most cases, as long as it is consensual and 5 legal. Now, it can be very harmful if it's illegal.</p> <p>6 Q. And consent is often in the eye of the 7 beholder?</p> <p>8 A. I think we have to trust the judgment of the 9 party who gave consent.</p> <p>10 Q. Trust the judgment of the 14-year-old boy, in 11 our example, correct?</p> <p>12 A. If he says that he himself pursued it or went 13 along with it and desired it, I -- I -- I -- I think we 14 have to trust that, particularly if he says that once he 15 is of adult age and has more understanding.</p> <p>16 Q. So, let's go to top of page 143.</p> <p>17 You say: The linking of gender-neutral 18 language with age-span provisions has had the effect of 19 legitimizing relationships between bumbling and 20 insensitive teenagers at the -- at the same time they 21 have prevented teenage boys from engaging in proper 22 learning experiences (physical and emotional) with 23 somewhat older and more adept partners.</p> <p>24 A. Yes, I would stand by that.</p> <p>25 Q. So, part of your criticism here is this</p>	<p style="text-align: right;">Page 145</p> <p>1 OED, III, under that word: So whereupon.</p> <p>2 Q. So, are these learning experiences proper or 3 not?</p> <p>4 A. They are properly defined as learning. See, 5 I'm -- you see, I'm adding a contingency there.</p> <p>6 Q. Proper is -- proper is what? It's an 7 adjective?</p> <p>8 A. Yes.</p> <p>9 Q. And what does it modify?</p> <p>10 A. Nouns.</p> <p>11 Q. The learning experience?</p> <p>12 A. Yes.</p> <p>13 Q. So, you're saying that the learning experience 14 was proper, right?</p> <p>15 A. The word "proper" has more than one definition.</p> <p>16 Q. But you're using it as an agentive, aren't you?</p> <p>17 A. It has more than one definition as an all -- 18 add -- adjective. Just look up the LED article. I 19 mean, it has, at least, three meanings. Its original 20 meaning is derived from the Latin proper use which means 21 one's own.</p> <p>22 Q. Okay.</p> <p>23 A. I mean, it is not necessarily saying it 24 means --</p> <p>25 Q. Is that what you meant, one's own learning</p>

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<p>1 experience?</p> <p>2 A. No. What I meant was OED, 3, properly defined.</p> <p>3 Properly speaking. That is the definition of "proper"</p> <p>4 even as an adjective.</p> <p>5 Q. And so you would agree that someone reading</p> <p>6 this perusing your text might come away with the</p> <p>7 impression that this sentence means that you believe</p> <p>8 that sex between boy -- teen boys and adult men can be a</p> <p>9 proper learning experience, the phrase you used?</p> <p>10 A. I don't believe someone would believe that who</p> <p>11 has read the whole article with care.</p> <p>12 Q. You think somebody --</p> <p>13 A. And who --</p> <p>14 Q. -- might believe that who's met you?</p> <p>15 A. Someone who has met me?</p> <p>16 Q. Yeah, met you and knows you as they talk to</p> <p>17 you.</p> <p>18 A. If they have talked with me about these issues,</p> <p>19 I would make it very clear to them that I strongly</p> <p>20 advise against anyone having a relationship with an</p> <p>21 adolescent in today's society in the United States.</p> <p>22 Q. That would be an improper learning experience,</p> <p>23 wouldn't it?</p> <p>24 A. Because it is unlawful.</p> <p>25 Q. Okay. So, sex between an adult male and a teen</p>	<p>Page 146</p> <p>1 definition of the word.</p> <p>2 Q. Let's go on to the next page, page 144. You</p> <p>3 ask -- you pose the question: Would the social cost not</p> <p>4 be less if we erected stronger barriers to sex between</p> <p>5 teenage boys and girls, but opened up boys to other</p> <p>6 safer sexual outlets now denied them, such as the</p> <p>7 freedom to associate it with adult women or gay and</p> <p>8 bisexual men.</p> <p>9 A. Yes.</p> <p>10 Q. So, you pose that question. Can you answer it?</p> <p>11 A. Well, again, it's a rhetorical question, like</p> <p>12 most of the questions that I ask in this essay; but I --</p> <p>13 I think it cannot be denied that sex between teenage</p> <p>14 boys and girls is one of the most risky forms, in -- in</p> <p>15 terms of lack of proper protection, lack of birth</p> <p>16 control, which is not readily available to most teenage</p> <p>17 girls -- although it is almost universally prescribed in</p> <p>18 Europe as soon as a girl reaches the age of puberty --</p> <p>19 and it is also more risky in reso -- in the possibility</p> <p>20 that it is somehow forcible sex. As I've told you</p> <p>21 before, the most common ages at which men commit rape</p> <p>22 are 17 and 18.</p> <p>23 Q. Yeah, you've told me that.</p> <p>24 MR. PRINGLE, JR.: Objection,</p> <p>25 nonresponsive.</p>
<p>Page 147</p> <p>1 boy would be an improper learning experience, wouldn't</p> <p>2 it?</p> <p>3 MR. SIBLEY: Objection.</p> <p>4 A. In the United States today.</p> <p>5 Q. (BY MR. PRINGLE, JR.) Okay. It wouldn't be a</p> <p>6 proper learning experience, as you've described it; it</p> <p>7 would be improper.</p> <p>8 MR. SIBLEY: Objection.</p> <p>9 A. What I described was OED, III, something that</p> <p>10 is properly defined as a learning experience; that is</p> <p>11 what I meant. Now, I can see the possibility where a</p> <p>12 naive reader who isn't very bright might misinterpret,</p> <p>13 you know, my words. And, in retrospect, maybe I</p> <p>14 should've said "properly learning experiences."</p> <p>15 Q. (BY MR. PRINGLE, JR.) Say that again.</p> <p>16 A. Maybe I should've used the adverb "properly."</p> <p>17 Q. Let's -- let's see how that reads.</p> <p>18 "They have prevented teenage boys from</p> <p>19 engaging in properly learning experience."</p> <p>20 What does that mean, "properly learning</p> <p>21 experience"?</p> <p>22 A. Properly defined as.</p> <p>23 Q. Oh. You just left out three words there?</p> <p>24 A. No, I'm using the adjective "proper" correctly.</p> <p>25 Just look up OED, III. You'll see that that is a</p>	<p>Page 149</p> <p>1 Q. (BY MR. PRINGLE, JR.) So, the question that</p> <p>2 you're asking is, wouldn't society be better off if we</p> <p>3 discouraged sex between teenage boys and girls and</p> <p>4 provided boys an opportunity to have sex with adult</p> <p>5 women and adult men?</p> <p>6 A. That is the question, yes.</p> <p>7 Q. Okay. And then you go on to say: Why should</p> <p>8 we assume that better sex is going to occur among two</p> <p>9 equally awkward ill-informed, inexperienced partners</p> <p>10 when, at least, that -- then in those situation where,</p> <p>11 at least, one partner know what they're doing, right?</p> <p>12 A. I asked that question.</p> <p>13 Q. Okay. So, you suggest that probably those</p> <p>14 children, those underage boys and girls, might have</p> <p>15 better sex with adults?</p> <p>16 A. It is a possibility --</p> <p>17 Q. Well --</p> <p>18 A. -- but I -- I would not call teenagers</p> <p>19 "children." I think that's very condescending.</p> <p>20 Q. Well, what -- why are you concerned whether</p> <p>21 those 14-year-old boys that I'm gonna call "children"</p> <p>22 have good sex? Why are you worried about that?</p> <p>23 A. I'd rather they have good sex than bad sex.</p> <p>24 Q. Why do you think that they're gonna have better</p> <p>25 sex with adults than they will with children?</p>

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1 A. I just explained it to you, and you said it was 2 nonresponsive.	1 that parent -- that person more than their parent? 2 MR. SIBLEY: Objection.
3 Q. And what was your answer, because they know 4 what they're doing?	3 A. Not that I insert the word "perhaps." And in 4 cases where parents may be abusive toward their 5 children -- and child abuse by parents, whether 6 physical, or emotional, or neglect is all too common -- 7 that, yeah, wherein cases where a parent is homophobic 8 and disapproves of their -- their child's sexual 9 orientation, I -- yes, I do think that they are 10 especially suspicious of any relationship the child 11 would have with another adult.
5 A. One, the possibility of rape is greater in the 6 case of young people. Second, the lack of birth control 7 is more common in the case of teenage girls; and third, 8 the lack of proper prophylactic technology to prevent 9 STDs is -- tends to be a problem when it's a teenage boy 10 and a teenage girl for that matter. Whereas more 11 experienced women and men know more about this.	12 Q. (BY MR. PRINGLE, JR.) So --
12 Q. You also go on to say that we readily -- too 13 readily forget the traditional rites of passage involve 14 adults leading as -- adolescents into the new world of 15 grown-up knowledge and skills --	13 A. When they might not be as suspicious of a 14 relationship with an equally naive people.
16 A. Yes.	15 Q. Do you -- do you believe that the source of 16 parental paren -- panic over pedophilia is a subliminal 17 fear that their children might love and -- the pedophile 18 more than them?
17 Q. -- including sex.	19 A. In some cases, I think that is probably the 20 case. I mean, if you understand the concept of 21 patriarchy, then -- or matriarchy for that matter, these 22 are concepts of the father or the mother treating the 23 family as personal property.
18 Are -- I guess you're questioning 19 shouldn't that be applic -- shouldn't that phenomena be 20 applicable to sex as well?	24 MR. PRINGLE, JR.: Objection, 25 nonresponsive.
21 A. Well, you're making an inference. I mean, I 22 don't say that specifically.	
23 Q. Were you making that inference?	
24 A. I'm describing rites of passage with -- which 25 is a concept in anthropology.	
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1 Q. But you're making that -- you're making --	1 Q. (BY MR. PRINGLE, JR.) The next sentence says: 2 Instead, parents attempt to manipulate their children 3 into scripted roles of heteronormative romance among 4 age-equals, none of whom can offer the parent serious 5 competition in intellect authority or financial 6 independence.
2 A. That --	7 A. Yes.
3 Q. -- that --	8 Q. So, you think that parents attempt to 9 manipulate their children into heterosexuality with 10 people their own age so as not to be threatened by a 11 pederast or a pedophile, earning the child's love and 12 admiration. Is that what that's saying?
4 A. -- that first sex is a rite of passage.	13 A. Most parents are, by definition, heterosexual. 14 And, yes, they -- they do encourage kids, 15 particularly -- even including gay kids, that 16 heterosexuality and marriage are -- are better options 17 than same-sex interactions, particularly same-sex 18 interactions with an adult.
5 Q. Right. And so you're asking, whether or not -- 6 as with other rites of a passage, maybe the concept of 7 sex ought to be passed down from adult to child, true?	19 Q. And you've -- and you write here that parents 20 attempt to manipulate their children into heterosexual 21 romance among children their own age --
8 A. It is a question I pose of this essay, but we 9 should emphasize adolescents are not children, and 10 adults are not necessarily dirty old men. In most of 11 these cases, we're talking about young men or young 12 women in their 20s or late teens.	22 A. Some --
13 Q. We're almost done here. So, one -- with this 14 article.	23 Q. -- age?
15 Wage -- page 145, on the right-hand side, 16 and I'm looking at this paragraph right here.	24 A. -- parents do.
17 A. Uh-huh.	25 Q. All right. Well, you don't say "some"; you
18 Q. It says: Perhaps the true source of parental 19 panic over pedophilia is a subliminal fear that their 20 children might love another adult man or woman more than 21 them.	
22 A. Yes.	
23 Q. Do you think that's what people are worried 24 about with pedophilia, that maybe this person who's 25 having sex with a prepubescent child, the child may love	

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<p style="text-align: right;">Page 154</p> <p>1 just say parents do that.</p> <p>2 A. I probably should've said "some."</p> <p>3 Q. All right. And the reason they do that is 4 because heterosexual relationship with a child, the 5 child's own age, can't really threaten the parents' 6 dominate -- domination and intellect authority for 7 financial independence?</p> <p>8 A. Yes.</p> <p>9 Q. All right. You think that the wiser form of 10 parental love must recognize the needs of children, 11 especially boys, to become independent and 12 self-confident in their dealings with the world?</p> <p>13 A. Yes, I do believe that.</p> <p>14 Q. And to give them the freedom to consent to 15 sexual relations with adult males; is --</p> <p>16 A. Or --</p> <p>17 Q. -- that --</p> <p>18 A. -- adult females.</p> <p>19 Q. Either one, true?</p> <p>20 A. I -- I believe that helicopter parenting, over 21 involvement in trying to script and determine an adolescent's life can be very harmful. Just look at 23 what has happened with adolescent mental health over the 24 last four or five decades. It has gotten steadily worse 25 and worse and worse, and a lot of this has to do with</p>	<p style="text-align: right;">Page 156</p> <p>1 exhibits to go through, and let me just ask you. I'm 2 gonna ask you a few questions about Exhibit No. 8.</p> <p>3 MR. PRINGLE, JR.: Joe, did I give you 4 this yet?</p> <p>5 MR. SIBLEY: I don't think so.</p> <p>6 MR. PRINGLE, JR.: Here you go.</p> <p>7 Q. (BY MR. PRINGLE, JR.) And you wrote Exhibit No. 8 8?</p> <p>9 A. Yes.</p> <p>10 Q. And you wrote it, approximately, 2010?</p> <p>11 A. Well, again, it's probably more 2009, because 12 there's a lag time in publication.</p> <p>13 Q. All right. And let's see. I'm gonna ask you 14 just a couple of questions about this, one about 15 Dr. Donald H. Mader, on page 96.</p> <p>16 A. Uh-huh. Yes. No, not doctor; reverend.</p> <p>17 Q. Reverend. Oh, you're right. Reverend Donald 18 Mader. He is completing his doctorate in gay studies at 19 the University of Amsterdam. I assume he's out now?</p> <p>20 A. I think he never finished.</p> <p>21 Q. Oh. What's -- do you know what he's doing now?</p> <p>22 A. It's been a number of years since I've had any 23 contact with him, so I -- I assume he -- well, I think 24 he told me that that church had been closed down. So, I 25 think he's, basically, retired.</p>
<p style="text-align: right;">Page 155</p> <p>1 erotic parenting. In fact, the greatest difference in 2 add -- in adolescent -- and I know you're gonna say 3 "nonresponsive," but it's a --</p> <p>4 Q. Or --</p> <p>5 A. -- great --</p> <p>6 Q. -- you can just stop talking if you want.</p> <p>7 A. I --</p> <p>8 Q. Okay. Any time you -- you realize that I'm 9 gonna say "nonresponsive," you can stop talking.</p> <p>10 A. Well, I -- I just want it on the record that --</p> <p>11 Q. You don't have to, but you should, I mean.</p> <p>12 A. I want it on the record that there are certain 13 things that you don't want to be part of the record.</p> <p>14 Q. No. There are certain things that I didn't ask 15 you that you're volunteering. And if your lawyer wants 16 to ask you questions to get all those things out, he's 17 more than welcome to; but I don't have to.</p> <p>18 MR. SIBLEY: Objection.</p> <p>19 Answer the question how you feel you need 20 to answer it. Let's go from there.</p> <p>21 (Exhibit 8 marked)</p> <p>22 Q. (BY MR. PRINGLE, JR.) Let's look at Exhibit No. 23 8.</p> <p>24 A. We are past 5:00 o'clock. Is it . . .</p> <p>25 Q. Yes, we are. I've got quite a few more</p>	<p style="text-align: right;">Page 157</p> <p>1 Q. Okay. So, his -- his proposition is an 2 application to the children of an objective test to 3 ascertain sexual knowledge and social skills and a 4 self-assertion of their own preferences --</p> <p>5 A. Uh-huh.</p> <p>6 Q. -- right?</p> <p>7 A. Yes.</p> <p>8 Q. So, do you agree with that?</p> <p>9 A. We're talking about a test that was originally 10 developed for the cognitively impaired.</p> <p>11 Q. And -- and do you agree with that?</p> <p>12 A. That, that could also be applied to -- to 13 children? Yes, I think that's an interesting 14 perspective, that if you have an adult who has the 15 mental capacity of a 14 year old, how is that different 16 from simply giving the test to a 14 year old with normal 17 mental capacity?</p> <p>18 Q. And so this test is -- is given to children to 19 ascertain their sexual knowledge and social skills 20 coupled with an effective and thorough sex education to 21 provide an assessment whether that child can give 22 effective consent to sexual relations with an adult, 23 correct?</p> <p>24 A. Yes. Mader presented an interesting idea there.</p>

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1 Q. And do you think that's a good idea?	1 break, please?
2 A. It's worth considering it.	2 MR. PRINGLE, JR.: We may. I'm sorry.
3 Q. Okay. And last page of this article, page 98,	3 THE REPORTER: Thank you.
4 you say: Any hope for positive change in the way our	4 THE VIDEOGRAPHER: Off the record at 5:32
5 society treats its boys and the capacity for sexual	5 {sic}.
6 self-realization must be embedded in a wider agenda of	6 (Recess from 5:31 p.m. to 5:44 p.m.)
7 certain things.	7 THE VIDEOGRAPHER: We're back on the
8 A. Self-realization and self-control.	8 record at 5:44.
9 Q. Right. And self-control.	9 Q. (BY MR. PRINGLE, JR.) All right. I want to
10 So, you're advo -- are you advocating for	10 change base with you, Professor, and ask you some
11 a positive change in the way our society treats its boys	11 questions about your demands for corrections and
12 here?	12 retractions.
13 A. Yes. That is the whole purpose of this	13 A. Yes.
14 scholarly journal.	14 Q. Do you know who you made demands for retract --
15 Q. Is that the whole purpose of all of your work	15 corrections and retractions to? Don't list them. Do
16 on pederasty is to -- shouldn't say pederasty -- on age	16 you know who you made them to?
17 of consent issues is positive change in the way our	17 A. Yes.
18 society treats its boys?	18 Q. You made one to Alex Newman?
19 A. Yes. My work is written mainly from the	19 A. Yes.
20 perspective of what is good for adolescent boys.	20 Q. And Alex Newman is the person affiliated with a
21 Q. And that's --	21 outfit called American Opinion Foundation?
22 A. Particularly gay boys.	22 A. Yes, which is, my understanding, is related to
23 Q. And --	23 the John Birch Society.
24 A. I couldn't care less about the minor attracted	24 Q. All right. And did -- was there ever any
25 adults, except to the extent that, I think, putting them	25 retraction made?
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1 in prison for decades is a misuse of resources, given	1 A. No, but they removed the article.
2 the lower recidivously rate.	2 Q. What makes you think that?
3 Q. And it sounds like you haven't given much	3 A. I think when I last checked, it said, "Page no
4 consideration to the non-gay and non-bisexual minors?	4 longer exists."
5 A. Well, in the article, we were just analyzing.	5 Q. Did they pay you any money?
6 I -- I do, also, talk about heterosexual boys with adult	6 A. No.
7 women. So, yes, I do consider that, but my main	7 Q. Did you ask for any money?
8 concern, as an activist and -- and -- and intellectual,	8 A. Well, no. We just demanded correction,
9 is -- is with gay boys.	9 retraction, or -- whatever the third term is, and --
10 Q. And that's what you're advocating for?	10 and -- and they -- they withdrew it, which was
11 A. Gay and bisexual.	11 satisfactory to us.
12 Q. Is -- is that what you're advocating for in	12 Q. And you made a demand for retraction and
13 these articles?	13 correction to the Dallas Morning News?
14 A. I think that their interest should be primary.	14 A. I did.
15 Q. All right.	15 Q. For a couple of editorials that were written
16 A. And if I believed that all relay -- sexual	16 about you?
17 relationships that they have with someone a bit older	17 A. One editorial.
18 were harmful, I -- I would be arguing that they should	18 Q. All right. And did the Dallas Morning News pay
19 continue to be banned.	19 you any money?
20 MR. PRINGLE, JR.: I'm gonna mark this as	20 MR. SIBLEY: I'm gonna have to -- we -- we
21 Exhibit No. 9.	21 can't -- we have a -- an agreement on that, which I'm
22 (Exhibit 9 marked)	22 happy to produce to you, but we have to go through the
23 THE REPORTER: Excuse me, sir?	23 notice provisions of the -- of the agreement in order to
24 MR. PRINGLE, JR.: Yes?	24 do that.
25 THE REPORTER: May I have a restroom	25 THE REPORTER: I can't hear you, Counsel.

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<p style="text-align: right;">Page 162</p> <p>1 MR. SIBLEY: Yeah, we have -- we have an 2 agreement in place that puts us in a -- potentially put 3 us in breach if we have to disclose that information. 4 But, if we give notice to the other party, there's a 5 process by which we can go through to designate that 6 confidential, and we will produce that document to 7 Mr. Pringle, and that should be sufficient to give him 8 his answer to -- to the question he asked.</p> <p>9 MR. PRINGLE, JR.: All right.</p> <p>10 Q. (BY MR. PRINGLE, JR.) And then we have the 11 retraction notice to Sarah that I am going to mark as 12 our next exhibit number . . .</p> <p>13 THE REPORTER: Ten.</p> <p>14 MR. PRINGLE, JR.: Ten.</p> <p>15 (Exhibit 10 marked)</p> <p>16 Q. (BY MR. PRINGLE, JR.) And that is the 17 retraction letter that was sent, correct?</p> <p>18 A. Yes.</p> <p>19 Q. Are all of your complaints about the flyer, 20 that she -- were all of the statements that you wanted 21 her to retract, that you felt were libelous or 22 defamatory, mentioned in your retraction letter?</p> <p>23 A. I'll have to reread it.</p> <p>24 Q. Well, let's go off the record while you do 25 that.</p>	<p style="text-align: right;">Page 164</p> <p>1 A. Because I ultimately decided that what he said 2 was not as bad as what some of the other defendants 3 said, and because he was leaving Austin to do graduate 4 school somewhere else.</p> <p>5 Q. Was it because he was a man?</p> <p>6 A. No.</p> <p>7 Q. You sued three women who made statements about 8 you, but none of the men; is that right?</p> <p>9 MR. SIBLEY: Objection.</p> <p>10 A. Ross was the only man that we asked to retract, 11 but, as I say, his statements were much shorter and much 12 less detailed and we felt it would not be as strong a 13 case. It has nothing to do with gender.</p> <p>14 Q. (BY MR. PRINGLE, JR.) And then -- okay. Just a 15 second here.</p> <p>16 You made a retraction demand to Hollie 17 Green?</p> <p>18 A. Yes.</p> <p>19 Q. And did she retract?</p> <p>20 A. No.</p> <p>21 Q. What -- mark this as Exhibit No. 11. (Exhibit 11 marked)</p> <p>22 Q. (BY MR. PRINGLE, JR.) Is that the response that 23 you made?</p> <p>24 MR. SIBLEY: Do you have another copy,</p>
<p style="text-align: right;">Page 163</p> <p>1 MR. SIBLEY: Well, we -- we're not gonna 2 go off the record whatever he needs to redo.</p> <p>3 A. I need to be given a fair chance to refresh my 4 memory. I -- I have not looked at this document since 5 over a year ago.</p> <p>6 Q. (BY MR. PRINGLE, JR.) Okay. Well, then I'll 7 withdraw the question.</p> <p>8 A. Okay.</p> <p>9 Q. You have a demand to the Office of VP for Legal 10 Affairs. Was there any retraction made there?</p> <p>11 A. They claimed sovereign immunity.</p> <p>12 Q. So, the answer's "no"? No retraction?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. You had sent a retraction letter to a 15 fellow named Samuel Joseph Ross?</p> <p>16 A. Yes.</p> <p>17 Q. And who is he?</p> <p>18 A. He was an undergraduate student of the classics 19 department, who had very soon after the posting of the 20 defendant's flyer, through the online site called 21 Sportula, had commented on the matter in -- in ways that 22 gave credence to the charges.</p> <p>23 Q. Did you -- did he retract any statements?</p> <p>24 A. No.</p> <p>25 Q. Why didn't you sue him?</p>	<p style="text-align: right;">Page 165</p> <p>1 Ross?</p> <p>2 MR. PRINGLE, JR.: Oh, I'm sorry.</p> <p>3 A. Yes, we've put this up online.</p> <p>4 Q. (BY MR. PRINGLE, JR.) And where did you post 5 it?</p> <p>6 A. Well, it has its own website address. It's not 7 part of any particular platform. One of my friends did 8 send the website address to Sportula as part of their 9 Twitter feed. And so far as I know, there were no 10 further comments on the matter after that. No further 11 comments on Sportula.</p> <p>12 (Exhibit 12 marked)</p> <p>13 Q. (BY MR. PRINGLE, JR.) Exhibit No. 12. This is 14 a series of e-mails between you and Avi; is that right?</p> <p>15 A. Yes.</p> <p>16 Q. Who is Bill Dobbs?</p> <p>17 A. He's an attorney in New York City who 18 specializes in sex offender issues.</p> <p>19 Q. And what has he represented you on before?</p> <p>20 A. Oh. He's -- he's never been -- he -- he -- 21 he's never had any attorney/client relationship with me.</p> <p>22 Q. Has he ever had any attorney -- attorney/client 23 relationship with the William A. Percy Foundation?</p> <p>24 A. No.</p> <p>25 Q. Let me see here. You say in here on page 3, in</p>

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<p style="text-align: right;">Page 166</p> <p>1 your e-mail to Avi, November 30th, 2019, that no one has 2 requested to look at your personnel file. Is that a 3 problem, somebody looking at your personnel file?</p> <p>4 A. Well, you yourself questioned me about material 5 in that file, and there are -- there is a form. Our 6 department chair put a lot of very negative allegations 7 in there, although ultimately the university settled 8 with me in a way that was satisfactory.</p> <p>9 Q. And are these communications between you and 10 Avi about preparation of your statement, by and large?</p> <p>11 A. Mostly.</p> <p>12 Q. All right. You say here that -- on the -- the 13 fourth page, you know, which we were just looking at 14 here, e-mail to Avi, November 30th, you say that she is 15 too stupid to know about how -- about -- she is too 16 stupid to know how to go about filing an Open Records 17 request.</p> <p>18 Who are you talking about there?</p> <p>19 A. Vader fille.</p> <p>20 Q. I don't know what that means.</p> <p>21 A. "Fille" is the French word for dog.</p> <p>22 Q. Okay. So, who is -- who is -- who are you 23 talking about there?</p> <p>24 A. The defendant.</p> <p>25 Q. You're talking about Sarah Blakemore?</p>	<p style="text-align: right;">Page 168</p> <p>1 A. And to me as well.</p> <p>2 Q. And so what -- but why would you make that 3 statement, that you think that my client's too stupid to 4 file an Open Re -- Records request? You don't even know 5 her, do you?</p> <p>6 A. I thought her flyer --</p> <p>7 Q. And that's the only --</p> <p>8 A. -- was --</p> <p>9 Q. -- way you know her?</p> <p>10 A. -- stupidity.</p> <p>11 Q. That's the only way you know her, right?</p> <p>12 A. That and her confrontation with me when she was 13 handing out the flyer.</p> <p>14 Q. Um . . .</p> <p>15 A. And that and the information that people found 16 on her social media.</p> <p>17 Q. Then, on page 1, you say -- or, actually, this 18 is Avi saying this, I think.</p> <p>19 If framed the right way, this could be 20 made to appeal to the LGBTQ crowd, but it's -- it's 21 ground that we -- as we know LGBTQers are super nervous 22 about.</p> <p>23 What does that mean?</p> <p>24 A. The mainstream gay rights organizations don't 25 like talking about adolescent sexuality.</p>
<p style="text-align: right;">Page 167</p> <p>1 A. Yes.</p> <p>2 Q. You think she's too stupid to know how to go 3 about filing an Open Records request?</p> <p>4 A. I don't think she's very bright.</p> <p>5 Q. That's not my question.</p> <p>6 Do you think she's too stupid to know 7 about going -- to go -- how to go about filing an Open 8 Records request?</p> <p>9 A. Well, that's what I said here.</p> <p>10 Q. I know that's what you said there. Is that 11 what you think?</p> <p>12 A. Well, I thought it at the time I said it.</p> <p>13 Q. Do you think it now?</p> <p>14 A. I don't know.</p> <p>15 Q. Okay. Why would you go -- why would you say 16 that she's too stupid to know about how -- how to file 17 an Open Records request?</p> <p>18 A. Well, I have a great deal of experience with 19 the Open Records process, and I know that the university 20 often resists Open Records requests, and that it can be 21 quite expensive to, you know, go to court to make them 22 open up records. And, you know, there were various 23 things in my file that might be embarrassing to the 24 university.</p> <p>25 Q. Or to you?</p>	<p style="text-align: right;">Page 169</p> <p>1 Q. Men don't like talking about pedophilia, do 2 they?</p> <p>3 A. No, of course not.</p> <p>4 Q. And they don't like coming to the aid of anyone 5 accused of pedophilia, do they?</p> <p>6 A. No, they do not.</p> <p>7 Q. Okay. You asked for funds from your -- from 8 your chair endowment to prosecute this lawsuit, didn't 9 you?</p> <p>10 A. No, I did not.</p> <p>11 Q. What did you ask them? What was the source of 12 funds that you requested to prosecute the lawsuit?</p> <p>13 A. Oh, excuse me. I -- yes, I did.</p> <p>14 Q. Okay. So, now you -- okay.</p> <p>15 So, why did you do that?</p> <p>16 A. Because I considered it a research expense.</p> <p>17 Q. A research expense to fight the lawsuit?</p> <p>18 A. To defend my scholarship against inaccurate 19 current relations on it.</p> <p>20 Q. To prosecute the liable lawsuit that you filed, 21 you felt, was part of your scholarship?</p> <p>22 A. It was defending my scholarship, and those 23 research funds are to promote and aid my scholarship, 24 and defending my scholarship does that.</p> <p>25 Q. And what was the response when you requested</p>

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1 for funds to do that?	1 A. That was the position at the University of
2 A. The person in the dean's finance office	2 Illinois, yes.
3 referred to it to the dean, and the dean referred to	3 Q. And so your reputation suffered damage for
4 doing -- refused to do it, saying that it was against	4 which it never recovered in 2009?
5 the rules. When I later submitted an Open Records	5 MR. SIBLEY: Objection.
6 request to see the rules, there were no rules.	6 Q. (BY MR. PRINGLE, JR.) Fair?
7 (Exhibit 13 marked)	7 MR. SIBLEY: Objection.
8 Q. (BY MR. PRINGLE, JR.) Exhibit 13. Well, do you	8 A. I don't know the answer to that.
9 have two copies?	9 Q. (BY MR. PRINGLE, JR.) Okay. Fair enough.
10 A. Uh-huh.	10 (Exhibit 14 marked)
11 Q. Yes. One of them's mine. I'm not sure which	11 Q. (BY MR. PRINGLE, JR.) Let's look at Exhibit 14.
12 one it is, but -- I don't know.	12 Have you seen this before?
13 This is a letter that you wrote to Randy	13 A. Yes, I have.
14 Diehl back in August, 2009, correct?	14 Q. What is it?
15 A. Yes.	15 MR. SIBLEY: I believe I have your copies.
16 Q. And you were proposing a buyout or a -- a	16 MR. PRINGLE, JR.: Oh. No. No. It's --
17 retirement where you would receive money from the	17 it's all highlighted. I don't know why.
18 university?	18 A. Yes, I have, and -- and I composed a detailed
19 A. Yes, although I fully expected he would refuse	19 refute -- refutation of it, point by point that is
20 it, as he did.	20 online.
21 Q. And you told the chair of your department, back	21 Q. (BY MR. PRINGLE, JR.) But this has a date of
22 in 2009, that you didn't feel like you could be hired	22 January 1, 2020. This was online in January of 2020,
23 elsewhere due to many false and defamatory rumors that	23 correct?
24 it spread throughout the profession, in 2009, true?	24 A. She -- she took it offline for a while, then
25 A. Yes, that the rumors that he and his faction	25 put it back online. I -- I, you know, find it so
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1 were spreading about my being a bad colleague and being	1 nauseating, I haven't particularly been following the
2 disruptive.	2 permutations of when it's offline and when it's online.
3 Q. So, your reputation was kind of damaged a	3 Q. It was posted June 28, 2018. You see on page
4 little bit in 2009?	4 10 of 11?
5 A. Yes, it was.	5 A. Yes, I see that.
6 Q. Okay.	6 Q. Is this -- so this, apparently, was on the
7 A. And it has since been damaged further.	7 internet from June of 2018, through, at least, the
8 Q. Yeah. Just how much and incremental we don't	8 publication of the flyer?
9 know, do we?	9 A. Yes.
10 A. It was damaged enough, in 2009, that I judged	10 Q. Is this some criticism of your scholarship and
11 no place else would hire me in a senior appointment.	11 your relationship with pederasty?
12 Plus, by 2009, I would've been what, 53? And,	12 MR. SIBLEY: Objection.
13 generally, for senior appointments, they like to	13 A. That is one of the things that she attempts to
14 appointment someone who has, at least, another 20 years	14 make false inferences about. I -- I would say that this
15 to go.	15 is itself libelous, but at the time, my attitude was:
16 Q. When you say that Classics remains a very small	16 It was better not to dignify it with a response.
17 field in the U.S., that's true?	17 Q. (BY MR. PRINGLE, JR.) So, this publication by
18 A. Yes.	18 Rebecca Futo Kennedy -- and by the way, she's a
19 Q. And before this, you got calls from many major	19 classicist in -- at a college in Ohio -- Ohio?
20 universities inviting you to apply for senior positions	20 A. Yes. She's an associate professor at Denison
21 there, right?	21 University.
22 A. Yes.	22 Q. Do you know her?
23 Q. And you were told of the rumors which resulted	23 A. Not personally.
24 in you losing a position that would've doubled your	24 Q. So, anyone wanting to read up on Thomas K.
25 salary back in 2009, correct?	25 Hubbard could read the statements by Rebecca Futo

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<p>1 Kennedy in this blog post, correct?</p> <p>2 A. Yes, they could; and I regret to this day that</p> <p>3 I did not sue her for liable at the time.</p> <p>4 Q. You never even threatened her, did you?</p> <p>5 A. No.</p> <p>6 Q. So --</p> <p>7 A. I -- I thought that would be beneath me and</p> <p>8 that the best thing is not to dignify it with a</p> <p>9 response, and that was what I was also advised by my</p> <p>10 department chair.</p> <p>11 Q. And so when you had -- did you and -- as -- as</p> <p>12 part of your statement responding to the flyer, did you</p> <p>13 invite students to research you and read up on your</p> <p>14 writings?</p> <p>15 A. Yes, I listed the relevant articles for them.</p> <p>16 Q. Does it surprise you that maybe some of the</p> <p>17 people that you invited to read up on you would've seen</p> <p>18 this --</p> <p>19 A. No, if they be --</p> <p>20 Q. -- Exhibit No. 14?</p> <p>21 A. -- if they were to have googled my name, they'd</p> <p>22 probably find it somewhere.</p> <p>23 Q. And so at least we know that, with respect to</p> <p>24 your good name, it would be somewhat compromised by the</p> <p>25 statements and assertions by Professor Kennedy in her</p>	<p>1 doesn't it?</p> <p>2 MR. SIBLEY: Objection.</p> <p>3 A. I expect intelligent people to carefully</p> <p>4 evaluate sources.</p> <p>5 (BY MR. PRINGLE, JR.) Maybe they did, right?</p> <p>6 A. Anyone who carefully evaluates Futo Kennedy's</p> <p>7 blog would see that she is mainly relying on anonymous</p> <p>8 sources concerning a conference paper that she was not</p> <p>9 present at. She talks about my 2010 article without</p> <p>10 having read it or even been aware of who the publisher</p> <p>11 was, and she talks about a seminar that I taught here</p> <p>12 when she was also not a participant. So, anyone with a</p> <p>13 kind of critical training that we give our students in</p> <p>14 classics would know that this is an unreliable source.</p> <p>15 Q. Certainly, what you -- what she says is, the</p> <p>16 most diligent and precise scholars can manipulate or</p> <p>17 misrepresent evidence to suit personal ends.</p> <p>18 You would agree, that's a -- that's a</p> <p>19 risk, isn't it, that happens?</p> <p>20 A. I think her blog is a prime example of it.</p> <p>21 Q. And, apparently, she thinks your writings are</p> <p>22 the same, doesn't she?</p> <p>23 A. But I seriously doubt she has read most of</p> <p>24 them. She admits she didn't read the 2010 article she</p> <p>25 talks about.</p>
<p style="text-align: right;">Page 175</p> <p>1 2018 blog post, which is up on the internet for all to</p> <p>2 say who google your name?</p> <p>3 A. I believe that the last we checked, she had</p> <p>4 withdrawn it again.</p> <p>5 Q. I'm talking about at the time the publication</p> <p>6 was -- was -- at -- at the time the flyer was published</p> <p>7 and handed out.</p> <p>8 A. So far as I know, it was still on the internet</p> <p>9 at that time.</p> <p>10 Q. And so your invitation for people to google you</p> <p>11 and to read up on you, you wouldn't be surprised that</p> <p>12 you would've -- they would've seen Rebecca Futo</p> <p>13 Kennedy's assertions with respect to you and your,</p> <p>14 quote, scholarship, would you?</p> <p>15 A. I don't believe that I encouraged them to</p> <p>16 google me. I asked them to read my publications and</p> <p>17 judge for themselves.</p> <p>18 Q. And --</p> <p>19 A. My publications, not someone else's</p> <p>20 publications about me.</p> <p>21 Q. Well, you certainly can't be critical of</p> <p>22 somebody wanting to see maybe other information about</p> <p>23 you besides what you suggest.</p> <p>24 MR. SIBLEY: Objection.</p> <p>25 Q. (BY MR. PRINGLE, JR.) That seems normal,</p>	<p style="text-align: right;">Page 177</p> <p>1 Q. She goes on to say that Professor Hubbard has</p> <p>2 been directly associated with NAMBLA, North American Man</p> <p>3 Boy Love Assoc -- Association, and association has</p> <p>4 promoted relationships between adult men and boys.</p> <p>5 So, anybody that wanting to investigate</p> <p>6 Profedder -- Professor Hubbard might see the comments of</p> <p>7 a -- another classicist criticizing Hubbard, wouldn't</p> <p>8 they, including the one I just read?</p> <p>9 A. It's is possible, yes.</p> <p>10 Q. She goes on to describe your efforts to get the</p> <p>11 Rind study published, correct?</p> <p>12 A. Yes.</p> <p>13 Q. That you had to actually pen a letter to the</p> <p>14 American Psychological Association or Psychiatric</p> <p>15 Association, the APA, to persuade them to assist in</p> <p>16 persuading them to publish the study?</p> <p>17 A. That is false.</p> <p>18 Q. Um . . .</p> <p>19 A. I -- I did write the American Philological</p> <p>20 Association.</p> <p>21 Q. Okay. There you go.</p> <p>22 Other than that, it's true?</p> <p>23 A. Yes, and the -- and the APA did, in fact,</p> <p>24 intervene in my case and did write a letter of protest</p> <p>25 to the publisher, and -- and that did affect the</p>

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<p style="text-align: right;">Page 178</p> <p>1 publisher in -- in terms of relenting and in writing us 2 to submit the publication to their Rutledge series. 3 Q. Would you agree that a person -- never mind. 4 That's fine. 5 (Exhibit 15 marked) 6 Q. (BY MR. PRINGLE, JR.) You have seen Exhibit No. 7 15, Davidson and his response to some type of 8 disagreement he had with you and Verstraete? 9 A. He was responding to a review of his terrible 10 book that Beert wrote, in which Beert referred to an 11 earlier review, a very negative review of his book that 12 I had written. I mean, the one I wrote was actually 13 much longer and more detailed than this one. 14 Q. And he says, on the topic of sex with minors, 15 he says: Obviously, this is the most important issue 16 for Verstraete and Hubbard and the reason why it's so -- 17 suddenly fallen so far from their favor. 18 Is that true? 19 A. No. 20 Q. It says: Hubbard's own Greek Love Reconsidered 21 was published by NAMBLA. 22 And in that introduction, you refer to the 23 outstanding work of Davidson, correct? 24 A. I thought his first book was very good. I -- I 25 was very disappointed in the second book, because it was</p>	<p style="text-align: right;">Page 180</p> <p>1 Q. All right. 2 A. That -- 3 THE VIDEOGRAPHER: Fix your mike -- oh, 4 sorry. Didn't mean to cut you off. 5 A. Yeah, it's I think I got tangled in the cord. 6 THE REPORTER: I'm sorry, I can't hear. 7 Is someone speaking? 8 THE VIDEOGRAPHER: Oh -- 9 MR. PRINGLE, JR.: No. 10 THE VIDEOGRAPHER: -- just letting Ross 11 know we lost the microphone. 12 THE WITNESS: Did you hear what I said? 13 THE REPORTER: Yes, I heard the answer. I 14 just -- there was other talking going -- 15 THE WITNESS: Oh. 16 THE REPORTER: -- on. 17 THE WITNESS: Yeah. That -- that's the 18 camera operator. 19 (Exhibit 16 marked) 20 Q. (BY MR. PRINGLE, JR.) And here in Exhibit 16, 21 is this Dr. Yarrow's blog? Or maybe it's not 22 Dr. Yarrow. Maybe it's Professor Yarrow. I don't know. 23 A. She's both. 24 Yes, this is her blog, once she makes the 25 corrections that I thought were property.</p>
<p style="text-align: right;">Page 179</p> <p>1 shoddy scholarship. I believe that the review that I 2 wrote is among the documents that we submitted to you in 3 response to the subpoena. 4 Q. It is. 5 Have you had discussions with Liv Yarrow? 6 A. (No verbal response.) 7 Q. Yarrow? 8 A. Yes. I -- I know of her. 9 Q. And who is she? 10 A. She's a professor at Brooklyn College, who 11 specializes in Roman Numismatics. 12 Q. And what is your -- the nature of your 13 discussion with her? 14 A. She wrote a blog in which she accused a number 15 of classists of pedophilia, and she did not accuse me of 16 that directly, but associated me with the four people 17 that she did accuse. And I wrote her a detailed letter 18 in which I told her that we public evidence on these 19 four people, at least two of whom I know personally. 20 Gave no evidence that they were actually guilty of 21 pedophilia, in the technical sense of the term. 22 Q. Did -- and did you threaten her with a lawsuit? 23 A. Not specifically. What I told her was, if she 24 did not withdraw or correct the statement, that I would 25 discuss it with my attorney.</p>	<p style="text-align: right;">Page 181</p> <p>1 Q. And so, as -- as corrected, do you think 2 Dr. Yarrow's blog is accurate? 3 A. Well, I'd have to read through this again. 4 It's some time since I last saw it. 5 Q. I assume that if you made -- if you 6 corresponded with Dr. Yarrow and indicated that if she 7 didn't change her blog, you were gonna discuss it with 8 your lawyer, that you subsequently looked at her blog 9 and satisfied yourself that you didn't need to sue her; 10 is that fair? 11 A. Yes. 12 Q. At that time that you reviewed the blog back 13 then, did you consider it to be accurate and fair? 14 A. I felt that it was no longer unfair enough that 15 it was worth pursuing. 16 Q. Okay. 17 A. I -- I -- I do not want to sue people just for 18 the sake of suing people. I only want to sue people 19 whom I consider directly responsible for grave harm. 20 (Exhibit 17 marked) 21 Q. (BY MR. PRINGLE, JR.) All right. Let's talk 22 about some of your writing here. Exhibit 17. This is 23 from -- this is a writing of what, a book review or? 24 A. No, it's the introduction to a publication of 25 writings by sex offenders explaining their history, and</p>

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<p style="text-align: right;">Page 182</p> <p>1 we -- I -- I felt that this publication could be useful 2 to social scientists working in the field of sex 3 offender therapy and treatment.</p> <p>4 Q. So, one thing you say, on page 2, of this 5 Exhibit 17 is -- paragraph that starts another study 6 about -- by Chaffin and others?</p> <p>7 A. Yes.</p> <p>8 Q. It says: As some of the contributions of this 9 collection reveal a large number of the boys with whom 10 these men, convicted sex offenders, had contact grew up 11 to be heterosexual. The issue needs to be studied 12 further with both qualitative and qual -- 13 quantitativeness methods.</p> <p>14 Did I read that right?</p> <p>15 A. Quantitive and qualitative methods.</p> <p>16 Q. Correct.</p> <p>17 Is that correct?</p> <p>18 A. Yes.</p> <p>19 Q. So, apparently then, the effect of -- of sexual 20 relations between adults and heterosexual boys needs to 21 be studied; hasn't been yet?</p> <p>22 A. It needs to be further studied, yes. The point 23 that I'm making with this statement --</p> <p>24 Q. I'm not asking the point.</p> <p>25 A. Okay.</p>	<p style="text-align: right;">Page 184</p> <p>1 MR. SIBLEY: Objection.</p> <p>2 Q. (BY MR. PRINGLE, JR.) Would you find that to be 3 less offensive?</p> <p>4 A. It is true that I do scholarship on a subset of 5 minor-attracted persons. It is not true that I do 6 scholarship on pedophilia, as the term is properly 7 defined. But, I believe, her flyer still would have 8 been defamatory because she makes statements like 9 "advocate the violent rape of teen boys," which I most 10 certainly do not.</p> <p>11 Q. You only advocate for loving consensual 12 relations between adult men and young boys, correct?</p> <p>13 MR. SIBLEY: Objection.</p> <p>14 A. I believe "advocate" is also a word that she 15 misuses.</p> <p>16 Q. (BY MR. PRINGLE, JR.) I'm not asking you if she 17 misused the word. I'm asking you if you advocate for 18 that?</p> <p>19 MR. SIBLEY: Objection.</p> <p>20 A. No, I do not.</p> <p>21 Q. (BY MR. PRINGLE, JR.) Okay. And all of the 22 articles that we've been talking about, where you pose 23 those questions, whether it be a proper learning 24 experience, and applicable to Western society, you 25 wouldn't consider that any sort of ad -- advocacy, would</p>
<p style="text-align: right;">Page 183</p> <p>1 Q. You go on to say: The more severe punishment 2 of gay MAPs.</p> <p>3 What is an MAP?</p> <p>4 A. I define it in the parentheses.</p> <p>5 Q. Oh. Minor-attracted persons. Pedophile, 6 right?</p> <p>7 A. Pedophile, as we've explained before, refers 8 specifically to children up to age 10 or 11.</p> <p>9 Q. Okay. So, pedophiles and pederasts?</p> <p>10 A. Pedophiles, hebephiles, and ephebophiles; those 11 are the three technical terms that are used in the 12 fields of psychology, sexology, and psychiatry.</p> <p>13 Q. And where is -- where's pederasts?</p> <p>14 A. Pederast is a term that is mainly used of 15 historical civilizations, and it is equivalent to the 16 current psychiatric term ephebophile.</p> <p>17 Q. So, certainly, pederasts are a subset of 18 minor-attracted persons --</p> <p>19 A. Yes.</p> <p>20 Q. -- correct?</p> <p>21 All right. Would you have considered the 22 flyer to have been defamatory if Miss Blakemore had 23 referred -- instead of using the word "pedophile" or 24 "pederasty," she used the term "minor-attracted 25 persons"?</p>	<p style="text-align: right;">Page 185</p> <p>1 you?</p> <p>2 MR. SIBLEY: Objection.</p> <p>3 A. Advocacy means wanting people to do it more, 4 and I do not want that because, I believe, in our 5 society, the risk of harm to all parties involved is far 6 too high.</p> <p>7 Q. (BY MR. PRINGLE, JR.) Doesn't advocacy also 8 include pointing out the benefits though?</p> <p>9 MR. SIBLEY: Objection.</p> <p>10 A. As I've -- I -- I've given you my definition of 11 advocacy.</p> <p>12 Q. (BY MR. PRINGLE, JR.) I'm asking you a 13 different question. Does advocacy also mean pointing 14 out the benefits of?</p> <p>15 MR. SIBLEY: Objection.</p> <p>16 A. No, not necessarily.</p> <p>17 Q. (BY MR. PRINGLE, JR.) Not necessarily, but can 18 it mean that?</p> <p>19 MR. SIBLEY: Objection.</p> <p>20 A. It is not the way that, I think, most people 21 would understand the word.</p> <p>22 Q. (BY MR. PRINGLE, JR.) It's not the way you 23 would understand the word? Are you --</p> <p>24 A. No, I said the common person -- most people.</p> <p>25 Q. I mean, clearly, you haven't situated a common</p>

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1 person about what advocacy is, have you?	1 A. And I do not think that it has very many
2 MR. SIBLEY: Objection.	2 benefits now.
3 A. I have taught common persons for over 40 years.	3 Q. You just question whether or not it has a place
4 Q. (BY MR. PRINGLE, JR.) Have you taught --	4 in modern society?
5 A. I think --	5 MR. SIBLEY: Objection.
6 Q. -- have you taught --	6 Q. (BY MR. PRINGLE, JR.) We saw that from the
7 A. -- I have --	7 article that we looked at, didn't we?
8 Q. -- them advocacy?	8 A. No, I don't believe so. What that article
9 A. I have taught them in a number of capacities.	9 focused on is whether teenagers -- teenage males
10 No, I do not teach my students advocacy. Most of my --	10 specifically -- are capable of consent. That's what
11 in fact, I would say almost all of my students have no	11 the -- was in the title of the article, it is what is in
12 idea what my politics is.	12 the -- in the title of the whole special issue of them,
13 Q. Well, I'm not asking about your politics at	13 Ross.
14 all. I'm asking --	14 Q. You go on to say here in the article that
15 A. Someone who teaches advocacy is someone who	15 entitled, "Social Garbage," on the last page, it says --
16 teaches the students that this is a position that the	16 A. Well, it's the book that's entitled, "Social
17 professor thinks is right and that they ought to follow.	17 Garbage."
18 Q. All right.	18 Q. I'm just reading the top -- the top line of the
19 A. I do not do that.	19 article. Okay?
20 Q. And --	20 A. The title of the article is "Introduction."
21 A. I am very careful not to do that.	21 Q. See here on page, VIII?
22 Q. Why are you so careful not to do it?	22 A. Yes, that -- that is part of the Introduction.
23 A. Because I believe it is wrong. There is far	23 Q. Yeah. And at the top of the page, it says,
24 too much politics that has intruded into American higher	24 "Social Garbage." That's where I'm at. That's the page
25 education --	25 I wanted to direct you to. Okay?
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1 Q. So --	1 A. Yeah.
2 A. -- usually from the left wing.	2 Q. All right.
3 Q. So, you disagree that your articles which point	3 A. But that is the title of the book, not of my
4 out the vast benefits and advantages of pederastic	4 Introduction.
5 relations, pointing it out to the reader does not	5 Q. All right. Whatever.
6 constitute -- well, does it constitute pointing out the	6 It says: When -- wherever one may stand
7 benefits of pederasty?	7 in the debate over the harmfulness of adult sexual
8 MR. SIBLEY: Objection.	8 contact with minors.
9 Q. (BY MR. PRINGLE, JR.) Let me start -- that --	9 You think there's a debate about whether
10 that's a bad question.	10 sexual contact between adults and minors, there's a
11 A. I agree.	11 legitimate debate about that, whether it's bad or not?
12 Q. Finally we agree on something.	12 MR. SIBLEY: Objection.
13 Do your articles that we've looked at	13 A. Well, NAMBLA certainly contends that it's, in
14 earlier, do they tend to point out the benefits and the	14 many cases, not. I don't agree with them. I think in
15 positive results of pederasty?	15 the vast majority of cases, in today's society, it is
16 MR. SIBLEY: Objection.	16 harmful.
17 A. They point out that it is not always as harmful	17 Q. (BY MR. PRINGLE, JR.) You pop -- pause with a
18 as is commonly assumed.	18 question on page 189, in the "Afterward." You asked:
19 Q. That there are benefits from it?	19 Did these men -- the men that -- and let's put this in
20 MR. SIBLEY: Objection.	20 context. You've interviewed and -- or maybe you didn't
21 A. Within a specific cultural context in which it	21 interview, but they submitted writings to you, these
22 is accepted, such as Ancient Greece. Yes, I do point	22 convicted sex offenders, correct?
23 out the benefits, but the cultural context of modern	23 A. Yes.
24 American society is entirely different.	24 Q. All right. And you identify them by -- by
25 Q. (BY MR. PRINGLE, JR.) And you --	25 initials: K.J., G.D., et cetera.

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<p>1 A. I did not; the editor of the volume did. I am 2 not the editor of this small -- I merely agreed to write 3 it, and production, and Afterward.</p> <p>4 Q. And -- and -- and in the first introductory 5 paragraph, and in your Afterward, can you read your last 6 sentence on page 189, the first paragraph?</p> <p>7 A. "Did these men become scoutmasters, camp 8 counselors, teachers, or even just friends to gain ready 9 access to boys they could groom, as the popular 10 narrative alleges, or is it because they were so often 11 around horny boys that temptation and opportunity 12 arose?"</p> <p>13 Again, I'm asking questions to which I 14 don't know the answer, but I think are questions 15 scholarship needs to ask.</p> <p>16 Q. You think it's a scholarly question to ask 17 whether pedophilia victims are just horny boys that 18 tempt adults?</p> <p>19 MR. SIBLEY: Objection.</p> <p>20 A. Again, I believe you're misusing the word 21 "pedophilia." I do believe that boys of adolescent age 22 are often horny and that some, naive or not very bright 23 adults, see an opportunity.</p> <p>24 Q. (BY MR. PRINGLE, JR.) And you think that's a 25 valid question, as to whether or not the men who are in</p>	<p>1 volume, an Ivan Greta.</p> <p>2 Q. And you're aware, these are men in prison for 3 sex crimes?</p> <p>4 A. Yes.</p> <p>5 Q. And you think they're pretty credible?</p> <p>6 A. I believe that the editor of the volume 7 developed a relationship with many of these men in which 8 they trusted him as someone who would be nonjudgmental.</p> <p>9 Q. That's not my question.</p> <p>10 Do you think these convicted sex offenders 11 in prison for felony sex offense are credible subjects, 12 deserving of belief as to the nature and extent of their 13 crime for which they're in prison?</p> <p>14 A. Some of them are, because some of them say that 15 they generally regret it and recognize that what they 16 did was wrong. One of them even said that he was 17 offering instructions in how sex offenders operate so 18 that parents would be more knowledgeable of how to 19 protect their children.</p> <p>20 Q. And the men -- you said: These men tell us 21 about their memory of the juvenile experiences, which 22 they did not in any way see as abusive, but positive and 23 pleasurable.</p> <p>24 A. Some of the narratives did talk about their own 25 experience when they were boys. And -- and, yes, some</p>
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<p>1 prison for having sex with minors are there because -- 2 not because they groom the boys, it's because they were 3 just around a bunch of horny boys that presented an 4 opportunity in temptation to these --</p> <p>5 MR. SIBLEY: Object --</p> <p>6 Q. (BY MR. PRINGLE, JR.) -- to these men?</p> <p>7 MR. SIBLEY: Objection.</p> <p>8 Q. (BY MR. PRINGLE, JR.) That's your que -- that's 9 the question. You think there's scholarly analysis?</p> <p>10 MR. SIBLEY: Objection.</p> <p>11 A. It -- it is what the men themselves say in the 12 narratives that they sent to the editor of the volume. 13 You'd re -- have to read their narratives, you know, to 14 see that quite often the sex was very incidental to 15 their relationship.</p> <p>16 Q. (BY MR. PRINGLE, JR.) And this is with --</p> <p>17 A. That's what it -- maybe happened once or twice 18 and that they weren't even necessarily the ones who 19 initiated it.</p> <p>20 Q. And this is based upon your -- the information 21 that these gentlemen provided to you?</p> <p>22 A. Yes, I read their narratives.</p> <p>23 Q. All right. And --</p> <p>24 A. But they did not provide the information to me. 25 They provided the information to the editor of the</p>	<p>1 of them said that they enjoyed it.</p> <p>2 Q. So, some of these men who are in prison for -- 3 for sex offenses say: I was sexually abused as a child, 4 and I liked it so I'm gonna -- I think it's a good 5 thing?</p> <p>6 MR. SIBLEY: Objection.</p> <p>7 A. They did not define it as abuse.</p> <p>8 Q. (BY MR. PRINGLE, JR.) I was sexually active 9 with an adult when I was a child, and I found it to be 10 pleasurable?</p> <p>11 A. Some of them admit that they were the ones who 12 initiated the sex and that the men even resisted it, but 13 they kept insisting until finally the adult gave in.</p> <p>14 Q. And this is -- these are the prisoners telling 15 you that they're in prison because of these sex 16 offenses?</p> <p>17 A. Yes. Okay. It's up to the reader to judge.</p> <p>18 Q. Indeed it is.</p> <p>19 A. -- whether they are credible or not.</p> <p>20 Q. It's up to the reader to judge everything the 21 reader reads, isn't it?</p> <p>22 A. Yes, it is.</p> <p>23 Q. The credibility of the author, the quality of 24 the scholarship, the viability of the opinions reached, 25 the --</p>

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1	A. Yes.		
2	Q. -- viability of the statements, the truth or		1 record at 6:37 {sic}.
3	accuracy of what's recorded --		2 Q. (BY MR. PRINGLE, JR.) Now, Professor, we talked
4	A. Yes.		3 about your two speeches -- or participation in the
5	Q. -- it's all up to the reader, isn't it?		4 NAMBLA conferences about 20 years ago?
6	MR. SIBLEY: Objection.		5 A. I did not give speeches there.
7	A. Well, this particular volume is not what I		6 Q. I know. I said, your participation in the
8	would call a scholar paper, but it was intended both for		7 conferences. You did that, didn't you?
9	sex offenders to understand other sex offenders, and it		8 MR. SIBLEY: Objection.
10	is intended for members of the general public, you know,		9 A. I was present at the conferences, and I
11	who may be relatives of the sex offenders. As I say,		10 occasionally said something.
12	one of them wrote saying that he was specifically		11 Q. (BY MR. PRINGLE, JR.) How many people were at
13	warning parents about how sex offenders operate. And --		12 the conference?
14	and in -- I mean, the only way you learn about these		13 A. Very small number. I would say no more than
15	people, and their -- their motives, and their way of		14 20.
16	thinking is to listen to them.		15 Q. Did you know most of the people there?
17	Q. (BY MR. PRINGLE, JR.) Well, that's not true.		16 A. No.
18	One of the ways you can learn from these men is by		17 Q. And I asked you, you've never been a member of
19	having proper learning experiences with them by having		18 NAMBLA?
20	sex; isn't that right?		19 A. No.
21	MR. SIBLEY: Objection, form.		20 Q. Never applied for membership?
22	A. It's not the way I could learn anything from		21 A. No. I subscribed to their publications for a
23	them.		22 while, but not a member --
24	Q. (BY MR. PRINGLE, JR.) But someone might?		23 Q. And --
25	MR. SIBLEY: Objection.		24 A. -- membership or --
			25 Q. -- when did you --
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1	A. It is possible, yes.		1 A. -- formal association.
2	(Exhibit 18 marked)		2 THE REPORTER: I'm sorry, I can't hear.
3	Q. (BY MR. PRINGLE, JR.) Okay. Exhibit No. 18 is		3 A. I had no membership or formal association with
4	a copy of your claim of discrimination against the		4 them.
5	university, correct?		5 Q. (BY MR. PRINGLE, JR.) What period of time did
6	A. Yes. This is the original EEOC complaint.		6 you subscribe to NAMBLA publications?
7	Q. And it includes an affidavit -- or, actually, a		7 A. In the 1990s, after I started teaching my
8	declaration, which you signed on December 15, 2020?		8 course on homosexuality and antiquity.
9	A. What page is that?		9 Q. Were you subscribing to the publications in
10	Q. Page 5 of 5, bottom.		10 2000, when you went to the conference?
11	A. Yes.		11 A. Yes, probably.
12	Q. That's your signature?		12 Q. So, you subscribed to publications for, seven,
13	A. Yes.		13 eight, ten years; something like that?
14	Q. And before you signed this document, you read		14 A. Yes, because I -- I wanted to learn their point
15	it and agreed to the contents of it as being true and		15 of view. I wanted to see how they appropriated or
16	accurate, didn't you?		16 understood the classical model, and I did learn things
17	A. Yes.		17 from them.
18	Q. All right. Thank you, sir.		18 Q. Was -- was Melzer -- Mr. Melzer your
19	MR. PRINGLE, JR.: Can you give me five		19 introduction into the NAMBLA membership, to get to --
20	minutes, and then I'll be done?		20 A. No.
21	MR. SIBLEY: Yeah.		21 Q. How -- how were you allowed to go to the --
22	THE VIDEOGRAPHER: Off the record at 6:31		22 those two conferences if you weren't a member?
23	{sic}.		23 A. They were advertised in my publications.
24	(Recess from 6:30 p.m. to 6:36 p.m.)		24 Q. They were -- don't they -- don't they -- don't
25	THE VIDEOGRAPHER: We're back on the		25 they limit attendance at those conferences to

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<p>1 individuals friendly to their views?</p> <p>2 A. No.</p> <p>3 Q. So, I could go to a NAMBLA? I could go to a</p> <p>4 NAMBLA meeting if I wanted to?</p> <p>5 A. My understanding is they no longer hold</p> <p>6 meetings.</p> <p>7 Q. Oh.</p> <p>8 Who is George Willard?</p> <p>9 A. That is the nom de plume of Avi Underwood.</p> <p>10 Q. Ah. Oh.</p> <p>11 A. It's the name that he uses in his American</p> <p>12 publications.</p> <p>13 Q. So, Avi wrote the article in Baltimore Outloud?</p> <p>14 A. Yes.</p> <p>15 Q. And did you review that article before you --</p> <p>16 before he sent it?</p> <p>17 A. I think so.</p> <p>18 Q. Did you endorse it?</p> <p>19 A. Endorse it? I felt it was accurate.</p> <p>20 Q. Did you review it to make sure it was accurate?</p> <p>21 A. I -- yes, I -- I believe that he showed it to</p> <p>22 me pre-publication.</p> <p>23 Q. Did you make any corrections to it? Changes?</p> <p>24 A. I don't remember. I -- I may have told him</p> <p>25 that a couple of things in the initial version were</p>	<p>Page 198</p> <p>1 But do you think my client had any</p> <p>2 involvement in organizing that?</p> <p>3 A. She is the one who told the popular women's</p> <p>4 movement that I am advocate of pedophilia, and that my</p> <p>5 seminar on rape had been banned by the university, and</p> <p>6 the other things that that group was claiming.</p> <p>7 Q. That's not my question. My question was, do</p> <p>8 you think my client had any involvement in organizing</p> <p>9 that?</p> <p>10 A. She had an involvement in making it possible.</p> <p>11 Q. Other than publication of the flyer, do you</p> <p>12 have any information that my client was in any way</p> <p>13 involved in that demonstration at your house, other than</p> <p>14 publication of the flyer two weeks before?</p> <p>15 MR. SIBLEY: Objection.</p> <p>16 A. Yes. We have evidence of that in the material</p> <p>17 we have received in discovery. We have evidence of her</p> <p>18 text messages with Patricia, no last name, who said that</p> <p>19 she was the -- the head of that group.</p> <p>20 Q. (BY MR. PRINGLE, JR.) And the text messages</p> <p>21 related to the -- to the protest?</p> <p>22 A. She had ceased contact with them after a</p> <p>23 certain point. So, she was not directly in contact with</p> <p>24 them at the time of the mob action, but she certainly</p> <p>25 was in contact with them before, as evidenced in the</p>
<p>1 inaccurate.</p> <p>2 Q. When you published the -- when you published</p> <p>3 the article in Wallace Press, which is a subset or a --</p> <p>4 a -- a front for the -- for NAMBLA, your test -- your</p> <p>5 sworn testimony is you had no understanding and</p> <p>6 affiliation between NAMBLA and Wallace Hamilton Press?</p> <p>7 A. I was led to believe they were two separate</p> <p>8 entities, but that Wallace Hamilton did work with</p> <p>9 NAMBLA, to the extent of selling some of the print run</p> <p>10 to them.</p> <p>11 Q. So, you were aware of an affiliation between</p> <p>12 Wallace Hamilton Press and NAMBLA when you made your</p> <p>13 publication?</p> <p>14 MR. SIBLEY: Objection.</p> <p>15 A. Depends what you mean by "affiliation."</p> <p>16 Q. (BY MR. PRINGLE, JR.) You're aware of a</p> <p>17 relationship between the two?</p> <p>18 A. I guess you could say that that existed, yes.</p> <p>19 Q. All right. At the time?</p> <p>20 A. Yes.</p> <p>21 Q. Now, one of the -- well, let me ask you about</p> <p>22 this. The incident at your house in early December, you</p> <p>23 remember that?</p> <p>24 A. Yes, certainly. How could I forget?</p> <p>25 Q. I don't know.</p>	<p>Page 199</p> <p>1 discovery.</p> <p>2 Q. Sure. Contact's great, but did she have any</p> <p>3 involvement in organizing it, or instructing it, or</p> <p>4 facilitating it other than publication of the flyer?</p> <p>5 MR. SIBLEY: Objection.</p> <p>6 Q. (BY MR. PRINGLE, JR.) That's my question.</p> <p>7 MR. SIBLEY: Objection.</p> <p>8 A. She was talking with the head of it, and she</p> <p>9 knew that this was a violent and disruptive group, as</p> <p>10 she revealed in her communications with Jeff Davis.</p> <p>11 Q. (BY MR. PRINGLE, JR.) And so my question to you</p> <p>12 is, is -- is that all? Anything else?</p> <p>13 A. To the extent that the -- I have access to</p> <p>14 information so far. It's what we've seen under</p> <p>15 discovery.</p> <p>16 Q. And you're not aware of anything else, as we</p> <p>17 sit here today, true?</p> <p>18 A. No. In -- in fact, my initial assumption was</p> <p>19 she had nothing to do with it.</p> <p>20 Q. And you're not aware of anything else, any</p> <p>21 other link between my client and the -- the protest at</p> <p>22 your house other than what you've told me about, that my</p> <p>23 client published the flyer and had some communication</p> <p>24 with a woman named Patricia?</p> <p>25 MR. SIBLEY: Objection.</p>

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Page 202	Page 204
<p>1 A. Communication relaying false charges against me 2 that motivated that group. And to that extent, but for 3 the defendant's actions, that group would've never heard 4 of me.</p> <p>5 Q. (BY MR. PRINGLE, JR.) How do you know that 6 group didn't research your writings and reach the same 7 conclusion that Miss Blakemore did? How do you know 8 that?</p> <p>9 A. I -- I do not know for sure what each member of 10 that group did. What I do know is she was in active 11 contact with them, as was Hollie Green, and that, you 12 know, but for their action, it is my belief that that 13 group would've never known about me.</p> <p>14 Q. Sure. And whether or not that -- that group 15 did, as Miss Blakemore did, and googled your name and 16 found Rebecca Futmoore -- Futo Kennedy's blog post on 17 you, highly critical of your scholar -- scholarly 18 endeavors, you have no idea, do you?</p> <p>19 MR. SIBLEY: Objection.</p> <p>20 A. I -- I have no way of knowing that, but I doubt 21 they would've googled my name but for the actions of the 22 defendant.</p> <p>23 Q. (BY MR. PRINGLE, JR.) Why do you think my 24 client googled your name?</p> <p>25 A. I don't know that she did. You're revealing</p>	<p>1 list of associated individuals, correct? 2 A. As one of four. 3 Q. As one of four. 4 And that was true when Miss Blakemore made 5 the statement that -- that you were involved with 6 NAMBLA? That you were listed on that page? 7 A. It is true that I was on the Wikipedia page, 8 but I was unaware of it. This was the first I heard of 9 it.</p> <p>10 Q. All right. You indicated that a lot of the 11 information you've gotten about my client is from 12 friends and associates? People sympathetic to you?</p> <p>13 MR. SIBLEY: Objection?</p> <p>14 A. From my teaching assistant, Alain Zaramian; and 15 from Avi Underwood who writes as American publications 16 under the name George Willard.</p> <p>17 THE REPORTER: I can't hear the -- under 18 the publication -- un --</p> <p>19 MR. PRINGLE, JR.: Under the name George 20 Willard.</p> <p>21 A. His American publications, he uses that name 22 because it is -- his Israeli name is -- is so strange 23 and foreign sounding.</p> <p>24 Q. (BY MR. PRINGLE, JR.) And what have you done to 25 verify the accuracy of what Avi and Alain told you?</p>
Page 203	Page 205
<p>1 new information to me.</p> <p>2 Q. Pretty safe assumption, isn't it?</p> <p>3 MR. SIBLEY: Objection.</p> <p>4 A. We'll find out when we depose her.</p> <p>5 Q. (BY MR. PRINGLE, JR.) You sure will. Okay. 6 Fair enough.</p> <p>7 How did -- how did you get your name off 8 the list of associated individuals of NAMBLA?</p> <p>9 A. I presented the management of Wikipedia with 10 refutation, including a public statement that I made at 11 a conference, around 2011 or '12, in which I made it 12 very clear that I did not agree with their positions, 13 but I nevertheless felt they had a right to speak.</p> <p>14 Q. No. My question is, how did you get it off, 15 not why did you get it off. You -- you -- you contacted 16 someone, and how was it actually modified at -- at your 17 request or demand?</p> <p>18 A. My understanding is that Wikipedia has records 19 of who it is that adds something to an article, and I 20 believe that we found that it was a man from Australia 21 who used the code name "Crossroads," and that he himself 22 said that he was not certain enough about the matter 23 that he would resist its removal.</p> <p>24 Q. And so the matter that we're talking about is 25 you were listed on the Wikipedia page for NAMBLA as a</p>	<p>1 A. I did look up her father's web page -- the web 2 page of his corporation and confirmed that he was, 3 indeed, a republican political activist. But for the 4 most part, I was relying on their research, because I do 5 not use social media. I don't touch it.</p> <p>6 Q. All right. Let's talk a little bit about 7 the -- the rally -- I mean the flyer. Okay?</p> <p>8 A. May I see the copy?</p> <p>9 Q. Sure. Let me get my copy here.</p> <p>10 UNIDENTIFIED FEMALE SPEAKER: There's one 11 also in the back of your e-mails.</p> <p>12 Q. (BY MR. PRINGLE, JR.) Here it is. Here it is. 13 Yeah, the e-mail. All right.</p> <p>14 MR. PRINGLE, JR.: So, Joe, just for your 15 edification, we're looking at one of the middle pages in 16 Exhibit 3.</p> <p>17 Q. (BY MR. PRINGLE, JR.) Let me see. Dr. Thomas 18 K. Hubbard has been advocating for pederasty 19 (pedophilia) for as long as he has taught at the 20 University of Texas.</p> <p>21 You say that's false, true?</p> <p>22 A. It is a misuse of both the word "advocate" and 23 "pedophilia."</p> <p>24 Q. Are you saying it's false?</p> <p>25 A. Yes.</p>

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<p style="text-align: right;">Page 206</p> <p>1 Q. Okay. You would -- would you disagree with the 2 statement: Dr. Thomas K. Hubbard has been touting the 3 benefits of pederasty for as long as he has taught at 4 the University of Texas?</p> <p>5 THE REPORTER: Touting the benefits of 6 what? I'm sorry, you're reading so fast.</p> <p>7 Q. (BY MR. PRINGLE, JR.) Would you agree that -- 8 with the statement: Don -- Dr. Thomas K. Hubbard has 9 been touting the benefits of pederasty for as long as he 10 has taught at the University of Texas?</p> <p>11 A. Excuse me. I don't see that statement here.</p> <p>12 Q. I know. That's all -- I'm asking you if you 13 would agree with that?</p> <p>14 A. No.</p> <p>15 Q. Would you agree with the statement: Dr. Thomas 16 K. Hubbard has been touting the benefits of pederasty 17 during his time at the University of Texas?</p> <p>18 A. Not the benefits of pederasty in the modern 19 world, but I have discussed it mostly in relation to 20 Ancient Greece, which was a culture in which it was 21 normalized.</p> <p>22 Q. Would you then agree with the statement 23 Dr. Thomas K. Hubbard has been touting the benefits of 24 pederasty and Ancient Greece during his time at the 25 University of Texas?</p>	<p style="text-align: right;">Page 208</p> <p>1 know, can recognize the attraction, but believe that 2 it -- it is, simply, has too much risk of harm to put it 3 into practice. I mean, there are many organizations now 4 that, you know, do serve that community, but equally 5 discourage people from actually acting upon their 6 attractions.</p> <p>7 Q. Would you agree that Dr. Hubbard, you, have 8 used your per -- your position to publish articles in 9 NAMBLA publications?</p> <p>10 A. I don't necessarily know, as my position at the 11 University of Texas, was why they asked me to that -- 12 that bar. I -- I think the reason was simply that I was 13 knowledgeable of Ancient Greece, and they were 14 interested in learning more about it.</p> <p>15 Q. And that was for the North American Man Boy 16 Love Association, true?</p> <p>17 A. Yes.</p> <p>18 Q. All right. And in his academic writing, 19 Hubbard describes physical relationships between men and 20 young boys as proper learning experiences, end quote.</p> <p>21 And that's quoted correctly, isn't it, 22 proper learning experiences?</p> <p>23 A. Those three words are, but they're taken out of 24 context.</p> <p>25 Q. So you say.</p>
<p style="text-align: right;">Page 207</p> <p>1 MR. SIBLEY: Objection.</p> <p>2 A. I -- I have explained what the Ancient Greeks 3 themselves thought about it.</p> <p>4 Q. (BY MR. PRINGLE, JR.) Okay. The next sentence 5 is: Since 2000, Dr. Hubbard has used his position to 6 further community of individuals hoping to pray on 7 underage boys.</p> <p>8 Would you agree with me that NAMBLA -- 9 NAMBLA members is a community of individuals hoping to 10 pray on underage boys?</p> <p>11 MR. SIBLEY: Objection.</p> <p>12 A. No.</p> <p>13 Q. (BY MR. PRINGLE, JR.) Okay. So, the National 14 Association of Man -- the Nash -- North American Man Boy 15 Love Association does not a community of individuals 16 hoping to pray on underage boys, is it?</p> <p>17 A. Judging from the publications that I have seen, 18 they warn their members against any legal violation.</p> <p>19 Q. But aren't -- if you're a member of NAMBLA, 20 aren't you an individual treated -- pre -- aren't you an 21 individual with a tendency to be attracted to underage 22 boys?</p> <p>23 A. I think that is probably true of most of them, 24 but I also believe that very many of them, including 25 Peter Melzer, are completely celibate, and -- and, you</p>	<p style="text-align: right;">Page 209</p> <p>1 And then refers to works, like boys 2 sexuality and age of consent encourage these elix -- 3 illicit acts.</p> <p>4 That's the actual article where that quote 5 comes from, isn't it?</p> <p>6 A. That -- that's part of the title.</p> <p>7 Q. Okay.</p> <p>8 A. But I do not agree that the article encourages 9 illicit acts.</p> <p>10 Q. Well, you actually don't even agree that your 11 writing describes physical relationships between men and 12 young boys as proper learning experiences, do you?</p> <p>13 A. As long as we define "proper" in the sense in 14 which I used it, which is OED, III.</p> <p>15 Q. Okay. So, you think that physical 16 relationships between men and young boys are learning 17 experiences that are proper?</p> <p>18 A. Experiences that -- no. We need to go back to 19 the context of that, that sentence. Can -- can we look 20 at the article again?</p> <p>21 Q. We don't need to.</p> <p>22 It says your -- his course, Mythology of 23 Rape, was banned at -- at UT after only one semester.</p> <p>24 We haven't talked much about that course, 25 but you did teach that course one semester?</p>

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<p style="text-align: right;">Page 210</p> <p>1 A. Yes.</p> <p>2 Q. And it was not offered again?</p> <p>3 A. Yes; and we have submitted, in response to your 4 subpoena, evidence that there was a plan to offer it 5 again, but ultimately both I and the department decided 6 that it would be better to teach something else?</p> <p>7 Q. What is --</p> <p>8 A. I -- I was not happy with the student responses 9 to the course and decided it -- it would be better not 10 to teach it again.</p> <p>11 Q. What is WGS? Is that Women Studies?</p> <p>12 A. Womens and Gender Studies.</p> <p>13 Q. Okay. And Women and Gender Studies did not 14 cross list this course?</p> <p>15 A. Not the first time, but they did agree to do it 16 the second time.</p> <p>17 Q. Of course, you had communications with the 18 people at Women's and Gender Studies about their 19 decision, initially, not to list the course, correct?</p> <p>20 A. It was never explained to me why they did not 21 list it initially, but what I think I have since learned 22 is that they generally want a course to be taught, at 23 least, once before they agree to cross list the course. 24 So, what happened in this case was not particularly 25 exceptional.</p>	<p style="text-align: right;">Page 212</p> <p>1 a -- that this was a topic that might be too traumatic 2 to one of their -- to their -- their students, and, 3 ultimately, I think they were probably right, yes.</p> <p>4 Q. And one of the reasons that it -- it wasn't 5 listed -- or wasn't offered is because nobody signed up 6 for it? Very few people signed up for it?</p> <p>7 A. The first time I taught it, it was about 13 8 students, and that's a fairly small enrollment for an 9 undergraduate class.</p> <p>10 Q. So, on August 1 of 2016, it says: Sue is very 11 doubtful that there'd be as many five WGS students who 12 would take the course, so I don't think it would make it 13 anyway.</p> <p>14 Just wasn't the --</p> <p>15 A. I -- I --</p> <p>16 Q. -- enrollment?</p> <p>17 A. Oh, yes. I -- I think that was part of the 18 reason ultimately.</p> <p>19 Q. Okay. And did -- did Dr. Kennedy, in her blog, 20 indicate that the cast was -- the course was banned 21 after one semester?</p> <p>22 A. I -- I do not recall. I would have to reread 23 the appropriate section. If you can refer me to the 24 page number, we can examine it.</p> <p>25 Q. Okay. You don't -- as we sit here, you don't</p>
<p style="text-align: right;">Page 211</p> <p>1 Q. And you complained to -- to the dean that the 2 reasons WGS gave you for not processing the course were 3 be -- mere pretexts?</p> <p>4 A. I don't recall doing that.</p> <p>5 Q. Okay. Do -- do you think that the reasons that 6 they gave for not listing the course were pretext 7 pre-textual?</p> <p>8 A. But they didn't give reasons. I've already 9 said that.</p> <p>10 (Exhibit 19 marked)</p> <p>11 Q. (BY MR. PRINGLE, JR.) No. 19. The last page -- 12 should be next to last page. You're writing Ms. Sue, 13 and you say: One of the pretexts for refusing to 14 cross-list the course was that Brown Miller was out of 15 date. Another pretext was that Voices Against Violence 16 was not invoked in the course description. The third 17 pretext was my course description failed to address the 18 contemporary rape elimination.</p> <p>19 THE REPORTER: I'm sorry --</p> <p>20 Q. (BY MR. PRINGLE, JR.) What are these pretexts? 21 What are these pretexts for? What do you think was the 22 real reason they weren't listing your course?</p> <p>23 A. There have been resistance to the course with 24 planned to, which is the honors program at the 25 university, because they just felt that this was not</p>	<p style="text-align: right;">Page 213</p> <p>1 know?</p> <p>2 A. I -- I do not recall. I mean, I do not 3 constantly read the -- that blog, because I find it so 4 unpleasant and untrue.</p> <p>5 Q. It says: Furthermore -- I'm back to the -- 6 yeah. Furthermore, Hubbard is heavily associated with 7 the North American Man Boy Love Association, NAMBLA, 8 formally the world's largest pedophile activist group.</p> <p>9 A. Okay. Are you on Exhibit 19?</p> <p>10 Q. No. I'm on Exhibit 3.</p> <p>11 A. Oh. We're back to that. We're --</p> <p>12 Q. Yeah.</p> <p>13 A. -- back to the flyer?</p> <p>14 Q. Uh-huh.</p> <p>15 A. I believe that "heavily associated" is wrong.</p> <p>16 Q. Unless -- is that a matter opinion, is whether 17 your association is heavy or light, 'cause you were 18 associated, weren't -- weren't you?</p> <p>19 A. Depends what you mean by "associate." If 20 talking to people and teaching people means associating 21 with them, then I guess you could say that I am. But, 22 does that mean heavily associating with them?</p> <p>23 I mean, I -- I've talked to members of the 24 Communist party. I once headed a department chair who 25 was a card carrying member. Does that mean I'm heavily</p>

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<p>1 associated with the Communist party? That's 2 McCarthy-ism by definition.</p> <p>3 MR. PRINGLE, JR.: Yeah, well, I'm not 4 really asking about that, so objection nonresponsive.</p> <p>5 Q. (BY MR. PRINGLE, JR.) So, when you say: 6 Hubbard -- when this says: Heavily -- Hubbard is 7 heavily associated with NAMBLA, formerly the world's 8 largest pedophile activist group, you take issue with 9 the word "heavily."</p> <p>10 MR. SIBLEY: Objection.</p> <p>11 A. I -- I do, and I take exception to the word 12 "associated," and I'm not sure I would call it "a 13 pedophile activist group." It was more of a 14 minor-attracted person support group.</p> <p>15 Q. (BY MR. PRINGLE, JR.) Minor-attractive 16 people -- minor-attracted persons being adults attracted 17 to underage children, among other things?</p> <p>18 MR. SIBLEY: Objection.</p> <p>19 A. Pedophiles, hebephiles, and epherbophiles.</p> <p>20 Q. (BY MR. PRINGLE, JR.) Okay. So, would you be 21 okay with the sentence if it had said: Hubbard was 22 published by the North American Man Boy Love Association 23 formerly the world's largest group of minor-attracted 24 persons? Would that be -- would that be an accurate 25 statement?</p>	<p>1 form of coercion or violence.</p> <p>2 Q. You are aware that any sort of sexual contact 3 between an adult male and an underage boy, in Texas, is 4 a crime of violence? You know that?</p> <p>5 A. No, it's -- no, it's -- I mean, it -- it's --</p> <p>6 Q. Just -- you just --</p> <p>7 A. -- it's a statutory. It is a statutory 8 offense. I mean, there's a difference between violent 9 rape and statutory rape, that's why we have the terms.</p> <p>10 Q. She doesn't say anything about violent rape, 11 does she? She talks about violent crime. You're aware 12 that sex between an adult male and a 14-year-old boy, in 13 Texas, is a crime of violence. Did you know that?</p> <p>14 MR. SIBLEY: Objection.</p> <p>15 A. It's a felony. Not all felonies are crimes of 16 violence.</p> <p>17 Q. (BY MR. PRINGLE, JR.) Do you know whether it's 18 a crime of violence or not?</p> <p>19 A. I -- I have read the statute. I do not believe 20 that the word "violence" is there on the section of the 21 statute that is pertinent to sexual assault against 22 underage persons.</p> <p>23 Q. You believe that. You don't know one way or 24 the other, do you?</p> <p>25 A. I have read the text of the law. I even taught</p>
<p style="text-align: right;">Page 215</p> <p>1 A. Yes.</p> <p>2 Q. Okay. And the next statement: He is even on 3 the list of associated individuals on the NAMBLA 4 Wikipedia page.</p> <p>5 That's true top, side, and bottom, isn't 6 it?</p> <p>7 A. At the time that she made this statement, it 8 was true. But, that statement was itself defamatory. 9 Quoting other people's defamatory statements is itself 10 defamatory.</p> <p>11 Q. No. She says: He's on the list of associating 12 individuals. That's subjectively true. Anybody who 13 goes to Wikipedia, they see that you're on the list of 14 associated individuals.</p> <p>15 A. But she articulates that sentence within a 16 context that suggests that that is evidence of my 17 agreeing with their views, which I do not.</p> <p>18 Q. I didn't see that. Where does she say that you 19 agree with their views? Point that out to me.</p> <p>20 A. It's the argument of the whole statement, is 21 that I'm furthering the community of individuals, by 22 which she means NAMBLA, and that I'm heavily associated 23 with the group, and, you know, that I advocate the 24 violent rape of teen boys. I mean, not even NAMBLA 25 advocates that. I mean, they're very much against any</p>	<p style="text-align: right;">Page 217</p> <p>1 it in some of my courses. I do not recall the word 2 "violence" being used in their definition of statutory 3 sexual assault. The word "assault" is used. The word 4 "felony" is used. I do not recall the word "violence" 5 being used. Maybe it is, but you'd have to show me the 6 text to me.</p> <p>7 Q. Well, would you agree that any sort of 8 nonconsensual sex between an adult and a minor is a 9 crime of violence?</p> <p>10 A. It may be a crime of manipulation.</p> <p>11 Q. That's not my question though.</p> <p>12 Is it a crime of violence? If you don't 13 know, tell me you don't know.</p> <p>14 A. Violence implies the use of force. Do all 15 contacts involve the use of force? No.</p> <p>16 Q. So, you don't have a position as to whether or 17 not nonconsensual sex between an adult male and a child 18 is a crime of violence?</p> <p>19 MR. SIBLEY: Objection. Objection.</p> <p>20 A. It -- it depends on how you define 21 "nonconsensual" and how you define "violence."</p> <p>22 Q. (BY MR. PRINGLE, JR.) I'm talking about 23 nonconsensual as being the fact that the child was not 24 old enough to give consent.</p> <p>25 A. That's a canard.</p>

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<p style="text-align: right;">Page 218</p> <p>1 Q. Uh-huh.</p> <p>2 A. I call that a canard and a legal fiction,</p> <p>3 because what the historical, anthropological,</p> <p>4 psychological evidence and the -- the statements of many</p> <p>5 people who as adolescent males have sexual experience</p> <p>6 with elders shows that -- that they -- they were quite</p> <p>7 conscious of what was going on, and, you know, quite</p> <p>8 capable of asserting the consent or not consent.</p> <p>9 Q. Is it --</p> <p>10 MR. SIBLEY: What time do we have?</p> <p>11 THE VIDEOGRAPHER: Seven hours and ten</p> <p>12 minutes.</p> <p>13 MR. SIBLEY: Oh. Yeah. We gotta -- you</p> <p>14 need to close it up and go.</p> <p>15 Q. (BY MR. PRINGLE, JR.) We refuse to stand by</p> <p>16 while this man uses his status to promote pedophilia.</p> <p>17 And your position is you have never</p> <p>18 promoted pedophilia, correct?</p> <p>19 A. My scholarship does not even concern</p> <p>20 pedophilia. It concerns ephebophilia or pederasty, and</p> <p>21 I don't promote it; I examine it.</p> <p>22 Q. And -- and we've -- and we pointed out that a</p> <p>23 lot of your scholarship analyzes the many benefits of</p> <p>24 sexual conduct between adults and minor children, true?</p> <p>25 MR. SIBLEY: Objection.</p>	<p style="text-align: right;">Page 220</p> <p>1 Athens during its whole history, but during a certain</p> <p>2 period of the late Fifth Century when Athens was a</p> <p>3 radical democracy and when there was an acute manpower</p> <p>4 shortage due to, you know, plague and war. And the age</p> <p>5 of marriage was reduced from the 30s to the early 20s or</p> <p>6 even late teens, it became progressively less respected.</p> <p>7 And, I mean, that's -- that's one of the, really,</p> <p>8 original things I think I contribute to the debate.</p> <p>9 Q. All right. I appreciate your time today,</p> <p>10 Doctor.</p> <p>11 A. Okay. Well, I'm glad it's over.</p> <p>12 MR. SIBLEY: Pass the witness?</p> <p>13 MR. PRINGLE, JR.: Yeah.</p> <p>14 MR. SIBLEY: All right. Reserve questions</p> <p>15 till time of trial.</p> <p>16 THE VIDEOGRAPHER: Off the record at 7:10</p> <p>17 {sic}.</p> <p>18 THE REPORTER: Okay. And signature?</p> <p>19 MR. SIBLEY: Yes.</p> <p>20 THE REPORTER: Read and sign?</p> <p>21 MR. SIBLEY: Yes.</p> <p>22 THE REPORTER: Okay. And did you want --</p> <p>23 oh. Wait just a minute. Wait just a minute, please.</p> <p>24 Did you want to purchase a copy of the transcript, sir?</p> <p>25 MR. SIBLEY: Yes.</p>
<p style="text-align: right;">Page 219</p> <p>1 A. The benefits within a society like Ancient</p> <p>2 Greece as viewed by the Greeks.</p> <p>3 Q. (BY MR. PRINGLE, JR.) Okay.</p> <p>4 A. Not necessarily as viewed by me. And I have</p> <p>5 repeatedly said that, I think, in contemporary American</p> <p>6 society, it really does not have a place, but I have</p> <p>7 also said it is not as harmful as many people assume.</p> <p>8 And the recidivism rates show that we do not need to</p> <p>9 imprison people for decades.</p> <p>10 Q. If it doesn't have a place in today's society</p> <p>11 and it was rejected in Athenian society, why do you</p> <p>12 write so much about it?</p> <p>13 A. Well, it was not always.</p> <p>14 THE REPORTER: I'm sorry, someone's</p> <p>15 hitting the -- the computer or something and I can't</p> <p>16 hear.</p> <p>17 Why do you -- why do you write -- what was</p> <p>18 that?</p> <p>19 Q. (BY MR. PRINGLE, JR.) Why do you write so much</p> <p>20 about it?</p> <p>21 A. Because it is a phenomenon of great interest in</p> <p>22 scholarship. There's been a lot of work done on it over</p> <p>23 the last four decades, and I concluded that a lot of</p> <p>24 this work was flawed and incorrect and anachronistic.</p> <p>25 And, no, it was not rejected by Athenian poli -- like</p>	<p style="text-align: right;">Page 221</p> <p>1 THE REPORTER: Okay.</p> <p>2 (Proceedings concluded at 7:09 p.m.)</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

May 25, 2021

222 to 225

				Page 222	Page 224
1	CHANGES AND SIGNATURE				
2	WITNESS NAME : Thomas Hubbard, Ph.D.			1	UNITED STATES DISTRICT COURT FOR THE
3	DATE OF DEPOSITION: May 25, 2021			2	WESTERN DISTRICT OF TEXAS
4	PAGE	LINE	CHANGE	3	AUSTIN DIVISION
5				DR. THOMAS HUBBARD, Ph.D.)	
6				Plaintiff,)	
7				4)	
8				v.) CA NO. 1:20-cv-00767-RP	
9				5)	
10				SARAH ALLEN BLAKEMORE; and) JURY DEMANDED	
11				6 JOHN DOES 1 - 10,)	
12				Defendants)	
13				7	
14				8	
15				9 REPORTER'S CERTIFICATE	
16				10 ORAL VIDEOTAPED DEPOSITION OF	
17				11 THOMAS HUBBARD, Ph.D.	
18				12 May 25, 2021	
19				13 VOLUME 2	
20				14 (Reported Remotely)	
21				15	
22				I, Jennifer L. Marquardt, the undersigned Certified	
23				16 Shorthand Reporter in and for the State of Texas (via	
24				17 Zoom) do hereby certify to the following:	
25				18 That I relieved a court reporter from the morning	
				19 session of Thomas Hubbard's deposition;	
				20 That the witness, Thomas Hubbard, Ph.D., (via Zoom),	
				21 was duly sworn by the court reporter and that the	
				22 transcript of the oral deposition is a true record of	
				23 the testimony given by the witness;	
				24 I further certify that pursuant of FRCP Rule	
				25	
				Page 223	Page 225
1				1	30(e)(1) that the signature of the deponent:
2				2	XX was requested by the deponent or a party
3				3	before the completion of the deposition and is to be
4				4	returned within 30 days from the date of receipt of the
5				5	transcript. If returned, the attached Changes and
6				6	Signature page contains any changes and the reasons
7				7	therefor;
8	I declare under penalty of perjury that the			8	— was not requested and/or was waived by the
9	foregoing is true and correct.			9	deponent or any party present and/or via Zoom before the
10				10	completion of the deposition;
11				11	That pursuant to information given to the deposition
12	THOMAS HUBBARD, Ph.D.			12	officer at the time said testimony was taken, the
13				13	following includes all parties of record and the amount
14				14	of time used by each party at the time of the
15	SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned			15	deposition:
16	authority, by the witness, THOMAS HUBBARD, Ph.D., on			16	JOSEPH D. SIBLEY : (00Hr:00m) (via Zoom)
17	this the _____ day of _____, _____. _____ NOTARY PUBLIC IN AND FOR THE STATE OF _____			17	Attorney for the Plaintiff, Thomas Hubbard, Ph.D.
18				18	BRANTLEY ROSS PRINGLE, JR.: (05Hr:00m) (via Zoom)
19				19	Attorney for the Defendant, Sarah Allen Blakemore
20	My Commission Expires: _____			20	That \$ _____ is the deposition officer's charges
21				21	to the Defendant, Sarah Allen Blakemore; Brantley Ross Pringle, Jr., Wright & Greenhill, P.C.: 900 Congress
22				22	Avenue, Suite 500, Austin, Texas 78701 for preparing the
23				23	original deposition and any copies of exhibits.
24				24	I further certify that I am neither attorney or
25				25	

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